

ROBOCALL MITIGATION PLAN

Company Name: DIAL STAR COMMUNICATIONS LLC

FRN: 0038535274

FCC Form 499 Filer ID: 839016

Principal Operating Address:

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United States

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Company Status

DIAL STAR COMMUNICATIONS LLC is a telecommunications service provider committed to delivering compliant voice communication services in accordance with applicable FCC regulations and industry standards.

The company has completed its regulatory onboarding, carrier readiness, network configuration, and compliance requirements necessary to support commercial voice operations. It has established comprehensive policies, procedures, and internal compliance controls to prevent illegal robocalls, caller ID spoofing, and other unlawful telecommunications activities.

DIAL STAR COMMUNICATIONS LLC maintains a robust Robocall Mitigation Program that includes customer verification, traffic monitoring, fraud detection, traceback cooperation, and ongoing compliance oversight to ensure adherence to all applicable regulatory obligations.

STIR/SHAKEN Implementation Status

DIAL STAR COMMUNICATIONS LLC has successfully implemented the STIR/SHAKEN framework in accordance with FCC requirements and applicable industry standards.

The company has completed the required onboarding process, including obtaining the necessary industry credentials, OCN registration, STI-PA authorization, SPC token, and an active STIR/SHAKEN certificate.

STIR/SHAKEN authentication is now operational for eligible outbound voice traffic. The company applies appropriate attestation levels in accordance with the relationship and verification status of each

customer, consistent with ATIS standards, STI-GA governance requirements, and applicable FCC regulations.

Attestation Framework

Full Attestation (A-Level)

Applied when DIAL STAR COMMUNICATIONS LLC has a direct relationship with the customer, has verified the customer's identity, and has confirmed the customer's right to use the calling number.

Partial Attestation (B-Level)

Applied when the source of the call can be authenticated but authorization to use the telephone number cannot be fully verified.

Gateway Attestation (C-Level)

Applied where the company serves as the gateway provider and sufficient information is unavailable to provide a higher level of attestation.

Although STIR/SHAKEN has been fully implemented, DIAL STAR COMMUNICATIONS LLC continues to maintain robust robocall mitigation procedures, customer verification processes, traffic monitoring, traceback cooperation, and fraud prevention controls to identify and prevent illegal robocalls, caller ID spoofing, and other unlawful telecommunications activities.

Business Model & Network Role

DIAL STAR COMMUNICATIONS LLC intends to operate as a wholesale and business telecommunications service provider.

Planned services include:

- Wholesale Voice Services
- SIP Trunking
- Business Voice Communications
- Carrier Interconnection Services
- Telecommunications Platform Services

Because commercial operations have not yet commenced, actual traffic volumes and customer distribution data are not currently available. Operational metrics and traffic classifications will be reviewed and updated as services become active.

Robocall Mitigation Program

DIAL STAR COMMUNICATIONS LLC has implemented the following policies and procedures to prevent illegal robocalls, caller ID spoofing, and unlawful telecommunications activity.

1. Know Your Customer (KYC) Procedures

Prior to service activation, customers may be required to provide:

- Business registration documentation
- Government-issued identification
- Tax identification information where applicable
- Proof of authority for authorized representatives
- Additional information necessary for compliance review

Enhanced due diligence may be conducted for higher-risk industries or use cases.

Service may be denied or terminated if customer information cannot be adequately verified.

2. Traffic Monitoring & Analytics

Upon commencement of operations, DIAL STAR COMMUNICATIONS LLC will implement continuous monitoring of network traffic to identify potentially unlawful activity, including:

- Abnormal call volume spikes
- Excessive short-duration calls
- Sequential dialing patterns
- Auto-dialing indicators
- Caller ID anomalies
- Suspicious traffic behavior

Automated alerts and compliance reviews will be utilized when unusual activity is detected.

3. Call Blocking & Filtering

The company reserves the right to block, reject, suspend, or terminate traffic that appears fraudulent, spoofed, unlawful, or inconsistent with customer authorization.

Traffic may be restricted where:

- Caller ID spoofing is detected
- Illegal robocall activity is suspected
- Regulatory violations are identified
- Customer verification cannot be completed

4. Do-Not-Originate (DNO) Protection

DIAL STAR COMMUNICATIONS LLC intends to utilize available industry resources and internal controls to identify and block:

- Invalid telephone numbers
- Unallocated numbering resources
- Spoofed caller IDs
- Numbers identified through applicable Do-Not-Originate programs

5. Traceback Cooperation

DIAL STAR COMMUNICATIONS LLC will cooperate fully with legitimate traceback requests from regulators, carriers, law enforcement agencies, and authorized industry traceback organizations.

The company will:

- Investigate traceback inquiries promptly
- Identify responsible customer accounts where applicable
- Preserve records relevant to investigations
- Respond within applicable regulatory timeframes

6. Upstream Provider Compliance

The company intends to utilize reputable and compliant upstream providers that maintain robocall mitigation programs and comply with applicable industry standards.

Preference will be given to providers that support STIR/SHAKEN implementation and traceback cooperation initiatives.

7. Customer Compliance & Enforcement

All customers will be required to comply with:

- FCC regulations
- Telephone Consumer Protection Act (TCPA)
- Telemarketing Sales Rule (TSR)
- Applicable Do-Not-Call requirements
- Company Terms of Service
- Acceptable Use Policy

Violations may result in:

- Immediate suspension
- Traffic blocking
- Service termination
- Reporting to appropriate authorities where required

8. Record Retention

The company will maintain records necessary for compliance and traceback purposes, including:

- Customer onboarding documentation
- Service agreements
- Call Detail Records (CDRs)
- Compliance investigation records

Records will be retained for a minimum of two (2) years or longer where required by law or regulation.

9. Regulatory Compliance

DIAL STAR COMMUNICATIONS LLC is committed to compliance with all applicable FCC regulations relating to robocall mitigation, call authentication, caller ID integrity, consumer protection, and telecommunications operations.

This Robocall Mitigation Plan will be reviewed periodically and updated as operations expand and regulatory requirements evolve.

Network Security & Traffic Controls

DIAL STAR COMMUNICATIONS LLC maintains policies and procedures designed to protect network integrity and prevent misuse of telecommunications services.

Where policy violations are identified, the company reserves the right to:

- Suspend services immediately
- Restrict or block traffic
- Conduct compliance investigations
- Permanently terminate customer accounts

Certification

I certify that the information contained in this Robocall Mitigation Plan is true and accurate to the best of my knowledge and reflects the current operational and compliance status of DIAL STAR COMMUNICATIONS LLC.

Submitted By:

JANY EDUARDO

Managing Member

DIAL STAR COMMUNICATIONS LLC

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