

ROBOCALL MITIGATION PLAN

DIALER92 LLC

Company Information

Item	Details
Company Name	DIALER92 LLC
FRN	0038560165
FCC Form 499 Filer ID	839040
Principal Operating Address	1500 N GRANT ST # 10896, DENVER, CO 80203
Website	www.dialer92.com
Owner / Compliance Contact	SHAIR MUHAMMAD
Email	support@dialer92.com

1. STIR/SHAKEN Implementation Status

DIALER92 LLC has successfully completed the implementation and deployment of STIR/SHAKEN within its applicable voice network operations. STIR/SHAKEN authentication is now an integral component of the company's caller ID authentication and robocall mitigation framework.

DIALER92 LLC will maintain, monitor, and periodically review its STIR/SHAKEN implementation and authentication processes to ensure continued adherence to applicable FCC robocall mitigation requirements and industry standards.

2. Business Model & Network Role

DIALER92 LLC participates in the telecommunications ecosystem in two primary capacities:

Wholesale Services

Providing voice termination and interconnection services to:

- Carrier partners
- Resellers
- Telecommunications providers

Direct Customer Services

Providing telecommunications services directly to retail and business customers originating traffic through the company's network and platform.

Estimated Traffic Distribution

Traffic Type	Percentage
Direct End-User Traffic	5% – 7%
Wholesale & Reseller Traffic	90% – 95%

3. Robocall Mitigation Program

DIALER92 LLC takes affirmative and effective measures to prevent its network from being used to originate illegal robocalls.

3.1 Know Your Customer (KYC) Procedures

- Identity verification of all customers prior to service activation.
- Collection of valid government identification.
- Collection of business registration records.
- Collection of tax identification documentation.
- Verification of authorized representatives.
- Risk-based customer onboarding and screening.
- Enhanced due diligence for high-risk industries including:
 - Debt recovery
 - Lead generation
 - Healthcare communications
 - Political outreach

3.2 Traffic Monitoring & Analytics

DIALER92 LLC continuously monitors inbound and outbound traffic using automated and manual review processes.

Monitoring includes:

- High-volume traffic spikes
- Short-duration call activity
- Sequential dialing patterns
- Auto-dialing behavior
- Completion-rate anomalies
- Other suspicious traffic indicators

Automated alerts are generated whenever unusual activity is detected.

3.3 Call Blocking & Filtering

The company utilizes automated fraud detection and filtering systems to:

- Block suspicious traffic;
- Prevent spoofed calling activity;
- Restrict calls with suspicious caller ID information; and

- Evaluate STIR/SHAKEN verification results and take appropriate action on failed, invalid, or suspicious authentication.

Traffic may be blocked, rejected, isolated, or investigated when warranted.

3.4 Do-Not-Originate (DNO) Protection

DIALER92 LLC maintains protections against caller ID spoofing and invalid number usage through:

- Industry-standard Do-Not-Originate (DNO) lists;
- Internal risk databases; and
- Blocking of invalid, unallocated, or spoofed telephone numbers.

3.5 Traceback Cooperation

DIALER92 LLC fully cooperates with traceback efforts and industry partners, including the U.S. Telecom Industry Traceback Group.

Traceback Procedures

- Responses to traceback requests within 24 hours or within the applicable regulatory timeframe.
- Investigation of the traffic source and associated customer account.
- Retention of traceback records for a minimum of two (2) years.

3.6 Upstream Provider Compliance

DIALER92 LLC works only with reputable and compliant upstream providers. Preference is given to carriers that:

- Have implemented STIR/SHAKEN; and
- Maintain strong robocall mitigation and compliance programs.

3.7 Downstream Customer Enforcement & TCPA Controls

All customers must comply with:

- Telephone Consumer Protection Act (TCPA)
- Telemarketing Sales Rule (TSR)
- Federal and State Do-Not-Call requirements
- Company Terms of Service
- Acceptable Use Policy

Additional controls include:

- Consent documentation requirements for outbound campaigns when applicable.
- Continuous monitoring of customer traffic.
- Immediate investigation of suspicious activity.
- Immediate suspension or permanent termination for policy violations.

3.8 Record Retention

DIALER92 LLC maintains:

- Call Detail Records (CDRs)
- Traffic monitoring logs

- Customer compliance records

Records are retained for a minimum of two (2) years and are available for regulatory or traceback purposes upon request.

3.9 Regulatory Compliance

DIALER92 LLC complies with all applicable regulations related to robocall mitigation, including:

- FCC Robocall Mitigation Requirements
- Telephone Consumer Protection Act (TCPA)
- Telemarketing Sales Rule (TSR)
- Federal and State Do-Not-Call Requirements
- Applicable STIR/SHAKEN Obligations

4. Network Security & Traffic Controls

To maintain network integrity and minimize abuse, DIALER92 LLC employs multiple monitoring, fraud detection, and enforcement mechanisms.

Where policy violations are identified:

- Services may be suspended immediately;
- Traffic may be blocked or restricted; and
- Accounts may be permanently terminated depending on the severity of the violation.

5. Management & Public Presence

DIALER92 LLC is a privately owned telecommunications company.

SHAIR MUHAMMAD serves as the Owner and primary point of contact for:

- Compliance
- Operations
- Carrier Relations
- Regulatory Matters

Management remains directly accessible and actively involved in day-to-day operations and compliance oversight.

The company continues to expand its public business presence and professional profiles across relevant industry platforms. Government-issued identification of the owner has been provided where required to support carrier due diligence and compliance reviews.

Submitted By

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