

Dial 9 Communications Limited

Robocall Mitigation Program

Updated September 14th, 2026

This document is submitted by Dial 9 Communications Limited ("Dial 9") in support of its certification in the Federal Communications Commission's Robocall Mitigation Database, and describes the robocall mitigation program Dial 9 operates pursuant to 47 CFR 64.6305.

1. Filer details

Legal name: Dial 9 Communications Limited

Registered in England and Wales, company number 07740921, incorporated 15 August 2011

Registered address: 124 City Road, London, England, EC1V 2NX

Other names in use: Landline Anywhere; Dial 9 Partners

Previous names: None

Parent undertaking: Krystal Hosting Ltd

FCC Registration Number: 0035374610

Operating Company Number: None. Dial 9 does not hold an OCN.

Foreign voice service provider: Yes. United Kingdom.

2. Robocall mitigation contact

Daniel Quinney, Director, Operations

124 City Road, London, England, EC1V 2NX

Telephone: +44 330 088 0900 Email: abuse@dia19.co.uk

This mailbox is monitored continuously and is the route for traceback requests and for any enquiry from the Commission, law enforcement or the industry traceback consortium.

3. Services and role in the call path

Dial 9 is a United Kingdom provider of cloud telephony services to business and residential subscribers, comprising hosted PBX, SIP trunking and virtual telephone numbers. Dial 9 serves direct retail customers and, through its partner programme, white-label resellers.

Dial 9 assigns telephone numbers from the North American Numbering Plan pertaining to the United States to its customers, and permits a customer to present such a number as caller ID on outbound calls where Dial 9 has assigned that number to the customer or the customer has demonstrated control of it. Dial 9 holds no numbering resources directly and holds no Operating Company Number; United States numbering resources are obtained from a carrier authorised to provide voice service in the United States, whose listing in the Robocall Mitigation Database Dial 9 has verified.

Calls originated by Dial 9 customers presenting United States numbering in the caller ID field are handed to that carrier for onward transmission into the United States. Dial 9 accordingly certifies as a foreign voice service provider under 47 CFR 64.6305(d).

Dial 9 operates no facilities in the United States and does not receive calls from other providers at facilities in the United States. It is therefore not a gateway provider within the meaning of the Commission's rules.

Dial 9 also provides service to white-label partners and resellers. Partners contract with and bill their own retail customers, but those end users are provisioned on Dial 9's platform using numbering resources assigned by Dial 9. Dial 9 is the originating voice service provider for that traffic and no partner originates calls on its own numbering resources or network.

Dial 9 does not provide, and contractually prohibits, telemarketing, cold calling, automated or sequential dialling, and call centre use of its services.

4. STIR/SHAKEN implementation

As a United Kingdom network, Dial 9 has not implemented the STIR/SHAKEN caller ID authentication framework on any portion of its network.

Dial 9 is not eligible to obtain a Service Provider Code token from the STI Policy Administrator. It does not hold an Operating Company Number or an FCC Form 499-A Filer Identification Number and is not authorised to provide voice service in the United States. Dial 9 therefore lacks control over the network infrastructure necessary to authenticate calls under 47 CFR 64.6301, and relies instead on the mitigation measures set out below.

Dial 9 complies with United Kingdom regulatory guidance on the presentation, verification and blocking of caller line identification, including Ofcom's requirements on CLI authenticity and the blocking of invalid and spoofed numbers.

5. Robocall mitigation program

Know your customer.

Dial 9 applies customer due diligence proportionate to the risk presented by the service and to the route by which the customer is onboarded.

Every direct sign-up is subject to baseline verification before service is activated. The customer's email address and telephone number are confirmed, a payment instrument must be established in a name matching the account, whether a payment card or a Direct Debit mandate, and customers presenting as limited companies are checked against the Companies House register.

Where a sign-up raises risk flags, Dial 9 requires documentary identity verification before service is activated. Verification is carried out through Stripe Identity and requires both a government-issued photographic identity document and independent proof of address. Verification links are single-use and expire after 24 hours, and a sign-up that is not completed is cancelled automatically. Business sign-ups subject to this check are verified against the personal identity documents and home address of the owner, not the business address. Where the address given at sign-up differs from the verified address, service is not activated until the discrepancy is resolved and, where a business address was used, documentary evidence of ownership of that business is provided.

End users provisioned through Dial 9's partner programme are onboarded by the partner. Dial 9 contracts with each partner on terms that require the partner to conduct its own customer due diligence and that prohibit unlawful use, telemarketing and automated or sequential dialling. Dial 9 retains the right to require customer identification from a partner and to suspend a partner, or an individual end user account, where illegal traffic is identified.

Sales enquiries indicating cold calling, telemarketing or dialler-based outbound campaigns are declined at the point of enquiry and are not onboarded on any tariff.

Acceptable use and contractual controls.

All customers contract on Dial 9's terms of service, which prohibit any unlawful use of the network, the transmission of altered, deceptive or false information about the identity or origin of a call, and telemarketing, automated or sequential dialling and call centre use. Breach entitles Dial 9 to suspend or terminate service immediately, and Dial 9 exercises that right where illegal traffic is identified.

Caller ID controls.

Customers may present as caller ID only numbers that Dial 9 has assigned to them or numbers for which the customer has demonstrated control. This is enforced at the network edge rather than by contractual term alone. A call presenting a number that the customer has not been assigned or has not demonstrated control of is rejected outright; it is not completed with a substituted or default caller ID. SIP trunking services are additionally authenticated against a registered static IP address.

Traffic monitoring and analytics.

Dial 9 monitors originating traffic continuously for patterns consistent with illegal robocalling, including abnormal call attempt rates, high volumes of short-duration calls, low answer-seizure ratios, calls to unallocated or invalid numbers, excessive call cancellations, and unexpected concentrations of traffic to a single destination or range. Alerts are raised automatically and investigated by Dial 9 personnel, who review call detail records against the customer's expected pattern of use, verify the origination path, and contact the customer to validate the activity where appropriate. Outcomes range from rate limiting through to suspension or termination of the account.

Analytics are performed in house on Dial 9's own platform. Dial 9 does not use a third-party robocall analytics vendor.

New customers requesting unusually high calls-per-second or large numbers of concurrent channels are screened for a legitimate use case before capacity is granted.

Upstream and downstream providers.

Dial 9 interconnects only with licensed carriers under contract. Where traffic is exchanged with a provider subject to the Commission's rules, Dial 9 verifies that the provider appears in the Robocall Mitigation Database and has not been de-listed, and will cease exchanging traffic with any provider notified by the Commission as having failed to satisfy its obligations under those rules.

Complaints and reports.

Complaints and reports of suspected illegal traffic, whether from customers, carrier partners, regulators or members of the public, are logged, triaged and acted upon through Dial 9's support platform, with each report tracked to resolution.

6. Traceback commitment

Dial 9 commits to respond fully and within 24 hours to all traceback requests from the Commission, from law enforcement, and from the industry traceback consortium, and to cooperate with those entities in investigating and stopping any illegal robocallers using its service. Requests should be directed to the contact at section 2 above. Cover is maintained outside United Kingdom business hours so that the 24-hour commitment is met irrespective of the time at which a request is received.

7. Regulatory and enforcement history

Dial 9 confirms that within the prior two years neither Dial 9 nor any entity with which it shares common ownership, management, directors or control has been the subject of any formal action or investigation by the Commission, by law enforcement, or by any regulatory agency involving findings of actual or suspected wrongdoing relating to the transmission of, or the encouragement, assistance or facilitation of, illegal robocalls or spoofing, or relating to a deficient Robocall Mitigation Database certification or mitigation program description.

8. Review and maintenance

This program is owned and reviewed by the Director named below, at least annually and following any material change to Dial 9's services or to the Commission's rules. Dial 9 will update its Robocall Mitigation Database filing within 10 business days of any change to the information it is required to submit, and will recertify annually on or before 1 March that the information in its filing is true and correct.

9. Certification

The undersigned, an officer of Dial 9 Communications Limited, certifies under 47 CFR 1.16 that all calls originated by Dial 9 are subject to the robocall mitigation program described above, that no prior certification of Dial 9 has been removed by Commission action, that Dial 9 has not been prohibited from filing in the Robocall Mitigation Database, and that the statements in this document are true and correct.

Daniel Quinney

Director, Dial 9 Communications Limited

Date: September 14th, 2026