

Robocall Mitigation Plan

ROXEN ORIGINAL (SMC-PRIVATE) LIMITED

1. Filer Information

Legal Entity Name: ROXEN ORIGINAL (SMC-PRIVATE) LIMITED

FCC Registration Number (FRN): 0038899894

Entity Type: Foreign Voice Service Provider (Private Sector, Corporation)

Business Address: Shop Number 8, Daska Road, Morr Masjid Sambrial, Sambrial, Punjab 51070, Pakistan

Country of Registration: Pakistan

Robocall Mitigation Point of Contact: Muhammad Shafiq, Director

Contact Phone: +92 344 4830574

Contact Email: shafiqsb4@gmail.com

2. Nature of Service

ROXEN ORIGINAL (SMC-PRIVATE) LIMITED, operating under the brand "DID & DIALER," provides a cloud-based call center platform to business subscribers, enabling outbound and inbound voice calling using North American Numbering Plan (NANP) telephone numbers. The Company originates outbound calls on behalf of its own business subscribers and terminates calls to the United States through a U.S.-based, STIR/SHAKEN-capable underlying voice service provider/carrier. The Company does not itself operate switching infrastructure that directly interconnects with the U.S. public switched telephone network; all NANP-originating and NANP-terminating traffic is carried through the Company's contracted U.S. carrier partner(s).

3. Caller ID Authentication (STIR/SHAKEN)

Because the Company originates traffic through a U.S.-based underlying carrier rather than operating its own U.S. network interconnection, caller ID (STIR/SHAKEN) attestation for calls carried on the Company's behalf is applied by that underlying carrier at the point of origination onto the U.S. network. The Company selects and contracts only with underlying carrier partners that maintain active STIR/SHAKEN implementation and a compliant Robocall Mitigation Database filing of their own.

4. Know Your Customer (KYC) and Onboarding Controls

The Company does not permit self-service, anonymous, or automated account creation. Every business subscriber is onboarded manually and must provide:

- A verifiable business identity and contact information
- A stated, legitimate business use case for outbound calling
- Agreement to the Company's Acceptable Use Policy, which prohibits illegal robocalling, spoofing, and unsolicited/non-consented calling campaigns

Accounts are provisioned individually by Company administrators after this review; there is no open public sign-up flow for placing calls.

5. Ongoing Monitoring and Abuse Prevention

The Company operates automated, real-time monitoring of outbound calling patterns on its platform, including:

- Automated pattern-detection that flags anomalous call volume, abnormal answer-seizure ratios, or other patterns consistent with illegal robocalling or spoofing for manual administrator review
- Do-Not-Call (DNC) list screening applied before outbound dialing
- Mandatory call recording across all calls placed on the platform, supporting investigation of any complaint

- Ability to immediately suspend or terminate any subscriber account found to be in violation of the Company's Acceptable Use Policy or applicable law

6. Traceback Cooperation

The Company commits to responding to any traceback request from the Industry Traceback Group (ITG), the FCC, or a downstream voice service provider within 24 hours of receipt, and to cooperating fully with any FCC or law-enforcement investigation into suspected illegal robocalling traceable to traffic originated on the Company's platform.

7. Recordkeeping

The Company retains call detail records (CDRs) and subscriber onboarding records for the period required under applicable FCC rules, to support traceback and compliance investigations.

8. Certification

The undersigned certifies that the information in this Robocall Mitigation Plan is accurate and that the Company will take the steps described herein to avoid originating illegal robocall traffic.

Signed: _____

Muhammad Shafiq, Director

Date: _____ 09/17/2026