

Robocall Mitigation Program Description

DN Dialer — Filed pursuant to 47 CFR § 64.6305

1. Nature of Service

DN Dialer is a non-facilities-based software platform used by licensed life insurance agencies to place outbound calls to consumers who have requested contact. All calls are agent-initiated, one-to-one — the platform does not perform autodialing, mass broadcast calling, or any form of robocalling. Telephony origination is provided by our upstream voice service provider; DN Dialer does not operate underlying network facilities.

2. Consent Capture and Verification

Every lead dialed through the platform carries one of the following consent provenance records before it becomes eligible to be called:

- a. Real-time capture: for leads submitted through DN Dialer's own public intake form, the platform records, at the moment of submission: a timestamp, the submitter's IP address (captured server-side to prevent spoofing), the exact URL where consent was given, the version of TCPA disclosure language displayed, a SHA-256 hash of the disclosure text actually shown, and, where available, a TrustedForm certificate.
- b. Agency attestation: for leads an agency sources itself (bulk upload or an inbound webhook from the agency's own advertising funnel), the importing agency must affirmatively attest that consent was already obtained from that contact before import is permitted. This attestation records which staff member attested it and when, and is stored distinctly from, and never represented as equivalent to, real-time capture.

No lead is callable without one of the above records on file.

3. Opt-Out and Do-Not-Call Handling

The platform maintains a do-not-call/opt-out suppression list, checked before every outbound call and text. Inbound STOP/START SMS keywords are processed automatically and update suppression in real time. A suppressed or opted-out contact cannot be dialed or texted again by any agency on the platform.

4. Call Pattern Controls

Newly provisioned outbound numbers are placed on a graduated calling-volume ramp (10 calls/hour for the first 3 days, scaling up to full capacity over two weeks) rather than dialing at full volume immediately, to avoid the call-pattern signatures associated with abusive traffic. Per-number hourly call caps are enforced platform-wide regardless of number age. An automated monitoring system detects numbers with abnormally low answer rates and rotates them out of use for review.

5. Authentication

Outbound calls are signed per the STIR/SHAKEN framework by our upstream voice service provider.

6. Traceback Cooperation

DN Dialer will respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (including the Industry Traceback Group), and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.