



Robocall Mitigation Plan

101Netlink
PO Box 101 Whitethorn CA 95589
(707)923-4000
www.101netlink.com

As a small, family-owned company offering internet and voice services to customers in Northern California, we pride ourselves on our personal relationships and the trust we've built within our community. Committed to upholding industry standards, we maintain full compliance with STIR/SHAKEN protocols and vigilantly monitor our network for any signs of suspicious activity. The following outlines our plan for mitigating robocalls.

In accordance with 47 C.F.R. § 64.6305, 101Netlink presents this report detailing its adherence to the STIR/SHAKEN call authentication framework and its strategies for preventing and mitigating illegal robocalls. This report provides an overview of the measures and protocols in place to address illegal robocalling. Our current status of STIR/SHAKEN is complete implementation as of June 30, 2022. 101Netlink reserves the right to amend, append, remove, or otherwise adjust any policies or procedures outlined in this plan as necessary to adapt to changes in our business operations, capabilities, and requirements.

Know Your Customer

We adhere to the caller ID authentication guidelines recommended by the NANC Call Authentication Trust Anchor Working Group to assess the legitimacy of caller identity and operational practices for both new and existing customers.

This procedure involves gathering and scrutinizing entity-identifying details to verify the authenticity of our relationship with the customer. We utilize this verified information to ascertain if the customer is subject to any regulatory actions limiting their calling activities, such as restrictions on telemarketing calls.

Whenever feasible, we validate the customer's legitimate entitlement to use their claimed caller IDs. This validation process aids in determining the attestation level assigned to calls originating from that customer.



Our service agreements with customers explicitly prohibit the initiation of illegal robocalls. In the event of suspicious robocalling activity, we issue warnings to cease such actions. If the problematic traffic persists, we reserve the right to terminate their service.

Robocall Mitigation

Customers are only permitted to make calls from their registered phone numbers. During service setup, we verify caller ID and call records to ensure the authenticity of caller information.

We strictly prohibit the automated generation of calls; all outgoing calls originate from human interaction.

Our firewalls are configured to exclusively allow traffic from authorized IP addresses.

We proactively block robocall numbers and identify suspicious calls.

Any suspected suspicious calls are promptly investigated to ascertain if the caller is attempting to initiate or transmit illegal robocalls. If evidence suggests unlawful activity, we issue warnings to cease such behavior. Should the customer persist in generating potentially unlawful traffic, we reserve the right to terminate their service.

STIR/SHAKEN

We have registered with the STI-PA using OCN 047K. We have our own STIR/SHAKEN certificate issued by the Neustar Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by Neustar and Sinch.