

Robocall Mitigation Plan

Business Name: Lincoln Communication Group, LLC

Business Address: 621 NW 53rd Street Suite 125 Boca Raton, FL 33487 (as of 12/1/24)

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Know Your Customer (KYC) Practices

Lincoln Communication Group adheres to strict Know Your Customer (KYC) procedures to ensure that no customers engage in illegal robocalling practices. These procedures include:

1. **Customer Identity Verification:**
 - All new and renewing customers must provide valid business documentation, including legal name(s), address, and contact information.
 - We cross-reference customer information with third-party databases to verify legitimacy and detect any associations with illegal robocall activity.
2. **Ongoing Customer Monitoring:**
 - All customers are subject to ongoing traffic analysis to detect unusual or suspicious patterns.
 - Periodic re-validation of customer details is conducted to ensure compliance.
3. **Customer Termination Policies:**
 - If illegal robocall activity is identified, the customer is immediately suspended pending investigation.
 - Termination occurs for verified violations, with notification to the FCC as required.

By combining robust verification, continuous monitoring, and enforcement mechanisms, Lincoln Communication Group ensures compliance with all relevant legal requirements and industry best practices.

Robocall Mitigation Program

To prevent illegal robocall activity on our network, we have implemented the following measures:

1. **Call Traffic Monitoring:**
 - We use advanced analytics software provided by **Pindrop** to monitor call patterns in real-time. This includes:
 - Detection of unusual call volumes.
 - Identification of short-duration calls indicative of robocall activity.
 - Cross-referencing with external fraud databases such as the FTC complaint database.
2. **Fraud Detection and Blocking:**

- Calls flagged by our analytics system are automatically blocked or quarantined for review.
 - Caller ID standards are enforced to ensure that only calls originating from verified sources on our network are allowed.
 - 3. **Reporting and Action:**
 - We promptly investigate flagged calls and take corrective actions, including notifying authorities and terminating abusive accounts.
 - 4. **Publicly Available Policies:**
 - Our terms of use explicitly prohibit fraudulent, abusive, or illegal calls. Violators are subject to suspension, termination, and potential legal action.
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Traceback Commitments

Lincoln Communication Group fully commits to responding to all traceback requests from the FCC, law enforcement, or the registered traceback consortium within 24 hours. We have designated a responsible individual to ensure compliance with these requirements.

STIR/SHAKEN Implementation

1. **Implementation Status:**
 - We have partially implemented STIR/SHAKEN and rely on our upstream provider to insert required headers when necessary.
 2. **Call Authentication:**
 - For calls that originate directly on our network, STIR/SHAKEN headers are applied when technically feasible.
 - Calls routed through upstream providers leverage their STIR/SHAKEN capabilities.
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Fraudulent Call Screening and Prevention

Lincoln Communication Group takes the following steps to prevent fraudulent activity:

1. **Third-Party Call Analytics:**
 - We employ software from **YouMail** and **Nomorobo** that provides real-time fraud analysis and flagging capabilities.
2. **Blacklists and Whitelists:**
 - Known fraudulent numbers are automatically blocked using regularly updated blacklists.
 - Legitimate customer numbers are protected through a whitelisting mechanism.
3. **Customer Education:**

- We provide educational resources to customers on avoiding fraudulent activity and maintaining compliance with FCC regulations.
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Compliance and Accountability

1. Business Details:

- Lincoln Communication Group provides all required identifying information in its RMD certification, including business name, address, contact details, and information about affiliates, subsidiaries, and parent companies.

2. Enforcement History:

- Lincoln Communication Group has not been subject to any FCC or law enforcement investigations for illegal robocalling or spoofing in the past two years.

3. Commitment to Compliance:

- We ensure that our operations comply with all FCC rules and regulations, and we are committed to updating our processes to address any new requirements.
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Conclusion

This Robocall Mitigation Plan demonstrates Lincoln Communication Group's commitment to preventing illegal robocalls and maintaining compliance with FCC regulations. We will continue to update and improve our practices to align with regulatory requirements and industry best practices.