

Robocall Mitigation Plan

Lake Linx, Inc.

Revised: March 2026

Lake Linx, Inc. is a small voice service provider (VSP) committed to stopping illegal calls from originating in our network and monitoring calls entering our network. The FCC requires that all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across their entire network, (2) implemented STIR/SHAKEN on a portion of their network with the remainder subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure the network is not originating illegal robocalls.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- Commits to cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls

Lake Linx, Inc. purchases origination, termination, and hosted-switch access from Atheral LLC (FRN 0028070290), who provides crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to Lake Linx, Inc.

I. STIR/SHAKEN Implementation Status

Lake Linx, Inc. is eligible for and is taking the STIR/SHAKEN implementation extension under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines. All voice traffic that originates on our network is subject to the robocall mitigation program described in this document.

All calls originating on our network are subject to the policies and procedures set forth in this Robocall Mitigation Plan, which are intended to prevent anyone from using Lake Linx, Inc.'s service to originate illegal robocalls.

II. Traceback Requests

Lake Linx, Inc. is committed to respond in a complete and timely manner—within 24 hours of receipt—to all traceback requests from the Federal Communications Commission (FCC), law enforcement, state attorneys general, Atheral LLC, and the Industry Traceback Group (ITG). Furthermore, Lake Linx, Inc. is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use Lake Linx, Inc. service to originate calls.

To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, Lake Linx, Inc. will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received.

As part of its efforts to assist in the successful traceback of illegal robocalls, Lake Linx, Inc. will include within its carrier interconnection and/or service agreements language requiring traceback cooperation on any voice service calls exchanged. These contract provisions will specify the need for parties to promptly identify the upstream provider from which a suspected illegal robocall entered the network or the customer from which the call originated.

Subscribers are required to comply with traceback requests per our Acceptable Use Policy (AUP). Traceback requests should be directed to the single point of contact identified in Appendix A.

III. Customer Vetting Practices

As a means of preventing or minimizing the origination of illegal robocalls through its voice services, Lake Linx, Inc. follows best practices for vetting caller identity as described by the NANC Call Authentication Trust Anchor Working Group (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

The subscriber vetting process is intended to confirm the legitimacy of a customer for the purpose of establishing a service relationship. Lake Linx, Inc. collects information including physical customer location, contact person(s), federal tax ID (for business accounts), and the nature of the customer's business.

Commercial and business subscribers, who generally present a higher risk of perpetrating illegal robocalls, may at Lake Linx, Inc.'s discretion be subject to additional review, including a more stringent background check and possibly a site visit.

In addition, Lake Linx, Inc.:

- Maintains an Acceptable Use Policy (AUP) that all subscribers must sign before being permitted to use Lake Linx, Inc.'s broadband or voice services. The AUP specifies that services must not be used for illegal robocalling and reserves Lake Linx, Inc.'s authority to suspend or terminate service for violations.
- Does not sell origination or termination services to subscribers outside of the United States.
- Requires any subscriber wishing to use a telephone number (TN) as a caller identity that is not directly managed by Lake Linx, Inc. or Atheral LLC to provide a valid letter of authorization confirming they are an authorized user of such TN. Documentation is provided to Atheral LLC to enable proper attestation of calls originated with those TNs.

IV. Telephone Number Validation Practices

Telephone Number Validation refers to the confirmation of the customer's or end-user's right to use a telephone number in connection with their subscribed voice services. In accord with industry best practices, Lake Linx, Inc. has procedures in place to confirm the calling customer's right to use a telephone number:

- Single-line voice subscribers: Switching equipment is configured to only accept calls originating from the number assigned to that subscriber.
- Multi-line telephone systems: Lake Linx, Inc. and Atheral LLC screen all originating calls and only allow calls to be connected if the originating number matches one of the numbers assigned to the subscriber.
- Third-party TNs: Where a subscriber wishes to use a TN not directly managed by Lake Linx, Inc. or Atheral LLC, the subscriber must provide a valid letter of authorization. Documentation is provided to Atheral LLC so that calls originated with those TNs can be properly attested.

These screening capabilities provide an automated and secure method of validating originating telephone numbers.

V. International Call Originators

Lake Linx, Inc. is not an international voice services provider and does not sell origination or termination services to subscribers outside of the United States. If at any time Lake Linx, Inc. sells services to customers who are international call originators using North American Numbering Plan resources, it will develop best practices for fully vetting such customers and performing telephone number validation on all internationally originated calls.

VI. Know Your Upstream Provider Procedures

As a small rural provider of voice services, the number of upstream providers used by Lake Linx, Inc. to receive and deliver originated voice calls for termination is limited. Lake Linx, Inc. maintains awareness of the nature of its upstream providers' businesses and the legitimacy of their call transmission services.

Lake Linx, Inc. purchases origination, termination, and hosted-switch access from Atheral LLC (FRN 0028070290), who serves as our primary upstream voice provider and wholesale partner. Lake Linx, Inc. is committed to taking those steps necessary to ensure that upstream providers are equally committed to monitoring their networks and preventing their use for the transmission of illegal robocalls. This includes the use of robocall prevention language in any contracts with upstream provider entities.

Current upstream provider information is listed in Appendix A.

VII. Ongoing Robocall Mitigation Practices

Lake Linx, Inc.'s wholesale VoIP provider, Atheral LLC, uses TransNexus's ClearIP solution to monitor origination voice traffic in real time to prevent the origination of illegal robocalls. The

software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral LLC if Lake Linx, Inc. originates any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation.

Atheral will immediately ask Lake Linx, Inc. to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If Lake Linx, Inc. or Atheral LLC determine that the caller was attempting to originate unlawful robocalls, the customer will be warned to stop or have their service terminated per our AUP. Identified customers will be contacted within twenty-four hours for further investigation and possible action.

When network usage patterns consistent with illegal robocalls are detected or Lake Linx, Inc. otherwise suspects illegal robocalling or spoofing is taking place on its network, it immediately seeks to identify the originating party. Actions taken may include, but are not limited to:

- Initiating a traceback investigation
- Verifying that the originating customer owns or is authorized to use the Caller ID number
- Determining whether the Caller ID name matches the customer's corporate name, trademark, or d/b/a name
- Terminating the party's ability to originate, terminate, or route calls on the network
- Providing notice to law enforcement authorities

In monitoring usage of its network, particular attention is given to:

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to high-cost geographic locations within a 60-minute period
- Recent call volumes (last 60 minutes) versus weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SCD) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- High-volume outbound call triggers or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) benchmarked against expected trends
- Originating calls with sequential called-to number dialing patterns
- Repeated calls made to Do Not Call registry or invalid numbers

- Calls to NPA-NXXs not assigned by the North American Numbering Plan Administrator

VIII. Third-Party Call Analytics

Lake Linx, Inc. uses third-party call analytics through its wholesale provider Atheral LLC to further assist in preventing the origination of illegal robocalls on its network. Atheral LLC utilizes TransNexus's ClearIP platform to monitor origination traffic in real time.

The ClearIP solution provides:

- Real-time traffic analysis and detection and mitigation of robocalls at origination
- Screening of calls where the calling number is invalid, unallocated, or on a Do Not Originate list
- Identification of calling numbers in the FCC consumer complaint database or with poor reputation scores
- Detailed CDR-based reporting to facilitate mitigation actions
- Alerting for anomalous calling patterns as described in Section VII

Third-party analytics vendor information is listed in Appendix A.

Appendix A – Contacts and Provider Information

Traceback Request Single Point of Contact

All traceback requests should be sent to the following contact for immediate processing by Lake Linx, Inc.:

Name: Nicholas Magarett

Title: Co-Owner

Phone: (760) 379-5469

Email: support@lakelinx.com

Upstream Provider Information

Name of Upstream Provider: Atheral LLC

FRN: 0028070290

Nature of Business: Interconnected white-label VoIP wholesale services; origination, termination, and hosted-switch access

Address: 1309 Coffeen Ave Ste 5838, Sheridan, WY 82801

Contact: Daniel White

Phone: (702) 470-2770

Email: info@atheral.com

Call Analytics Vendor

Name of Vendor: TransNexus (via Atheral LLC)

Description: Atheral LLC uses TransNexus's ClearIP solution to monitor Lake Linx, Inc.'s origination voice traffic in real time. The platform provides identification of suspected illegal robocalls, screening against Do Not Originate lists and the FCC consumer complaint database, reputation scoring, and detailed CDR reporting to support mitigation actions.