

LinkedPhone LLC – Robocall Mitigation Plan

1. Contact Information:

- **Company:** LinkedPhone LLC
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2. Overview

LinkedPhone LLC is committed to **stopping illegal robocalls** from originating on its network and ensuring compliance with **47 CFR § 64.6305**.

As a **Voice Service Provider** serving the **small business community**, LinkedPhone takes a proactive approach to customer vetting, call traffic monitoring, and traceback compliance.

Our ongoing efforts include:

- **Verifying customer identity** and intent during onboarding.
- **Monitoring call traffic** for suspicious activity using robust analytics.
- **Promptly responding** to any flagged accounts or illegal activity.

LinkedPhone does not market or support high-volume auto-dialing or predictive dialer services.

LinkedPhone is dedicated to maintaining the integrity of its network while delivering high-quality telephony services to small businesses.

3. STIR/SHAKEN Implementation

LinkedPhone certifies that all of the calls that it originates on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a), which shall include reasonable steps to avoid originating illegal robocall traffic and shall include a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

LinkedPhone implements STIR/SHAKEN in cooperation with its upstream providers. Where technically feasible, LinkedPhone signs outbound calls with the appropriate attestation level (A, B, or C). In cases where direct signing is not technically possible, LinkedPhone ensures calls are transmitted through fully STIR/SHAKEN-compliant upstream carriers.

4. Measures to Prevent Illegal Robocalls

LinkedPhone has implemented a comprehensive set of measures to **prevent illegal robocalls** from originating on its network:

- **Customer Identity Verification:**
 - Customers must provide valid **business information** during registration, including legal name, and contact details.
 - Customers are required to verify ownership using **two-factor authentication (2FA)** via a U.S.-based cell phone number.
 - LinkedPhone performs a **carrier lookup** to confirm the cell phone number is active, valid, and associated with a recognized U.S. carrier.
 - LinkedPhone evaluates intended call and messaging use cases during onboarding to ensure compliance with FCC and TCPA requirements. Customers are prohibited from engaging in robocalling, political auto-dialing, phishing, lead generation without consent, or any other traffic requiring prior express consent without documented proof.
- **Business Intent and Policy Compliance:**
 - Customers must explicitly confirm adherence to LinkedPhone's **Terms of Service** and **Reasonable Use Policy**, which prohibit illegal robocall activity.
 - LinkedPhone requires customers to comply with the Telephone Consumer Protection Act (TCPA).
- **Manual Review of High-Risk Signups:**

LinkedPhone manually flags and reviews accounts that exhibit any of the following risk indicators:

 - High projected call volumes during signup.
 - Suspicious or incomplete business information.
 - Use of VoIP numbers, disposable emails, or IP addresses associated with proxies or anonymization tools.
- **Ongoing Customer Monitoring:**
 - LinkedPhone actively monitors call patterns to detect:
 - High call volumes of short-duration calls.
 - Invalid or unassigned destination numbers.
 - Flagged customers are monitored closely for initial call behavior.
 - LinkedPhone enforces dynamic call rate limits and volume thresholds for new accounts to prevent large-scale robocall campaigns.
 - Accounts engaged in illegal activity are **immediately suspended or terminated**.

5. Upstream Provider Verification

LinkedPhone works with upstream providers to ensure compliance throughout the call chain:

- Require all upstream providers to **certify compliance** with FCC robocall mitigation rules.
- Conduct periodic reviews and audits of upstream provider traffic to verify alignment with **industry standards** and identify suspicious activity.
- LinkedPhone verifies that upstream providers are listed in the FCC Robocall Mitigation Database and are not subject to enforcement actions.

LinkedPhone will discontinue partnerships with non-compliant upstream providers to maintain network integrity.

6. Traceback Compliance

LinkedPhone commits to:

- Fully responding to **traceback requests** from the **FCC, law enforcement**, or the **Industry Traceback Group (ITG)** within **24 hours**.
 - Cooperating fully with investigations to identify and stop illegal robocallers using LinkedPhone's services.
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7. Call Blocking

To proactively mitigate illegal robocalls, LinkedPhone implements the following measures:

- **Do Not Originate (DNO):** LinkedPhone honors DNO requests received from the ITG and other authoritative entities.
- **Automated Call Blocking:** Suspicious or confirmed illegal robocall traffic is automatically blocked based on analytics and DNO lists.
- Enhanced analytics to identify high-risk call patterns.
- LinkedPhone is in constant contact with customers and partners to report suspected illegal robocall activity. Reports are investigated promptly.

8. Principals, Affiliates, Subsidiaries, Parent Companies

- **Principals:**
 - Alvaro Navarrete, Managing Partner
 - Jesse Isola, Managing Partner
- **Affiliates:** None
- **Subsidiaries:** None
- **Parent Companies:** None

9. Plan Updates

LinkedPhone will **review and update** this Robocall Mitigation Plan as necessary to remain compliant with evolving **FCC regulations**. LinkedPhone will update its Robocall Mitigation Database filing within 10 days of any material change.

References

- **Website:** <https://linkedphone.com>
 - **Terms of Service:** <https://linkedphone.com/terms-of-service>
 - **Privacy Policy:** <https://linkedphone.com/privacy-policy>
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