

Joyn Communications LLC DBA TeleClear Communications – Robocall Mitigation Plan

1. Company Information

- **Legal Name:** Joyn Communications LLC DBA TeleClear Communicaitons
 - **FRN:** 0031481278
 - **Contact Person:** Dani Shea Joyner, CEO
 - **Email:** shea@myteleclear.com, crystal@myteleclear.com
 - **Phone:** 214-927-5284
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2. STIR/SHAKEN Implementation Status

- Joyn Communications lacks control over the network infrastructure necessary to implement STIR/SHAKEN because it is using a white labeled switching platform/3rd party PBX. Joyn Communications is in the process of making switching infrastructure changes in order to deploy STIR/SHAKEN. This RMD Certification will be updated accordingly when the work is completed.
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3. Traceback Requests

- Joyn Communications commits to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.
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4. Customer Vetting (KYC)

To prevent unlawful robocall origination, TeleClear:

- We require a valid EIN/tax ID
- We verify company registrations, tax records, or other official filings to ensure the customer is a legitimate entity
- We prohibit anonymous or prepaid signups
- We immediately suspend or terminate accounts found to be originating unlawful robocalls

5. Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers. We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider. We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic. Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

6. Traffic Monitoring & Mitigation

TeleClear actively monitors customer traffic to detect and prevent robocall abuse:

- Real-time analytics flag abnormal usage (e.g., excessive calls per minute, short duration spikes, sequential dialing).
- Suspicious accounts are investigated immediately and suspended if abuse is confirmed
- Teleclear coordinates with our 3rd party PBX/whitelabel providers to block unlawful traffic and share analytics for traceability

7. Compliance & Updates

- This plan complies with 47 CFR § 64.6305 and related FCC requirements
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8. Certification

I, the undersigned officer of Joyn Communications LLC DBA TeleClear Communications certify under penalty of perjury that the foregoing Robocall Mitigation Plan is true, accurate and complete, and that Joyn Communications LLC DBA TeleClear will comply with all FCC rules, enforcement actions, and deadlines.

Signed: Dani Shea Joyner

Name: Dani Shea Joyner

Title: CEO

Date: 11/25/2025