

lyonl networks inc. certifies that it has fully implemented the STIR/SHAKEN authentication framework across its entire network and that all calls it originates are compliant with 47 CFR § 64.6301(a)(1) and (2). Consistent with 47 CFR § 64.6305(a), lyonl maintains a robust robocall mitigation program designed to prevent the origination of illegal robocall traffic. This program includes:

1. **Know Your Customer (KYC) Procedures:** We employ strict KYC policies to verify each client's identity and the legitimacy of their call traffic before allowing origination.
2. **Restricted IP Whitelisting:** We only permit call origination from whitelisted IP addresses. No client is permitted to add or use its own SIP providers without prior review and explicit approval by lyonl.
3. **Network Access Controls:** We do not allow any unauthorized use of our voice systems for telephony calls. All voice traffic is either directly from lyonl or on behalf of its business and its legitimate clients.
4. **Traceback and Compliance:** lyonl responds fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. We cooperate with these entities in investigating and stopping any illegal robocaller using our network.
5. **Exemption Status:** We confirm that any prior STIR/SHAKEN exemption or extension no longer applies, as we have now fully implemented the STIR/SHAKEN framework for 100% of our traffic.

lyonl affirms that any previous STIR/SHAKEN certifications have not been removed by Commission action and that we have not been prohibited from filing in the Robocall Mitigation Database by the Commission. We commit to continually monitoring our traffic to prevent and mitigate unlawful robocalls, and we stand ready to take swift action should we detect or be notified of any suspicious or illegal calling activity.