

Ylinx, LLC Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by Ylinx, LLC. This document outlines Ylinx, LLC's policies and procedures to reduce or eliminate outbound illegal robocalls originating on its network, constituting "reasonable steps" to prevent such calls. Ylinx, LLC commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) and cooperating in investigations to stop illegal robocallers.

I. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC's Robocall Mitigation Database, Ylinx, LLC's STIR/SHAKEN implementation status is as follows:

- Ylinx, LLC has implemented the STIR/SHAKEN authentication framework on its network.

II. TRACEBACK REQUESTS

Ylinx, LLC will cooperate with the FCC, law enforcement, and the ITG on all traceback requests and investigations, dedicating sufficient resources to respond within 24 hours. A single point of contact for traceback requests which is contact@ylinx.com. Ylinx, LLC will include language in carrier interconnection and service agreements requiring traceback cooperation, specifying the identification of upstream providers or customers originating suspected illegal robocalls.

III. CUSTOMER VETTING PRACTICES

To prevent illegal robocalls, Ylinx, LLC employs best practices to vet all voice service subscribers (residential, business, or resale). The vetting process confirms customer legitimacy through:

- Collecting information such as physical location, contact person(s), state/country of incorporation, federal tax ID, and business nature.
- Vetting during service provisioning, agreement execution, and telephone number assignment.
- Additional review for commercial end users, including background checks and possible site visits for higher-risk customers.
- Uses service agreements and acceptable use policies prohibiting illegal robocalls, reserving the right to suspend or terminate services for violations.
- Monitors network usage and call detail records (CDRs) to identify unusual or suspicious calling patterns, contacting customers within 24 hours for investigation if such activity is detected.

IV. TELEPHONE NUMBER VALIDATION PRACTICES

Ylinx, LLC confirms customers' rights to use telephone numbers per industry best practices:

- Subscribers may use numbers directly managed by Ylinx, LLC or obtained via partners.
- For single-line services (TDM or IP), switching equipment only accepts calls from assigned numbers.
- For multi-line systems (TDM or IP), Ylinx, LLC screens calls to ensure the originating number matches an assigned number, enabling automated validation.

V. INTERNATIONAL CALL ORIGINATORS

Ylinx, LLC does not currently provide international voice services. If it does in the future, it will develop best practices for vetting international customers and validating their calls using North American Numbering Plan resources.

VI. ONGOING ROBOCALL MITIGATION PRACTICES

Ylinx, LLC monitors network usage and CDRs to detect suspicious activity, such as:

- High traffic volumes or spikes.
- Short-duration calls with low completion rates.
- Sequential dialing patterns.
- Calls to do-not-call registry or invalid numbers.
- Calls to unassigned NPA-NXXs.

Upon detecting potential illegal robocalls, Ylinx, LLC may:

- Initiate traceback investigations.
- Verify Caller ID ownership.
- Confirm Caller ID name accuracy.
- Terminate the party's ability to originate calls.
- Notify law enforcement.