

JLink Technology Solutions
Robocall Mitigation Program Description

1. Provider Role in the Call Chain

We operate as a **voice service provider** with a STIR/SHAKEN implementation obligation, serving end-users.

2. STIR/SHAKEN Implementation Certification

- We certify that we have **fully implemented STIR/SHAKEN** in our system.
 - All SIP calls that we terminate outbound are signed with STIR/SHAKEN attestation in compliance with **47 CFR § 64.6301**.
 - Outbound termination calls are signed with certificates obtained from an authorized STI-CA approved by the Policy Management Authority (PMA).
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3. Robocall Mitigation Program Certification

Pursuant to **47 CFR § 64.6305**, JLink Technology Solutions certifies that:

- All calls we originate are subject to a robocall mitigation program reasonably designed to **significantly reduce unlawful robocalls**.
 - We will **comply with all traceback requests within 24 hours** of receipt, whether from the Commission, law enforcement, or the Industry Traceback Group.
 - We will **cooperate fully** in investigations and enforcement actions related to unlawful robocalls.
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4. Robocall Mitigation Plan (Detailed Practices)

Our mitigation program includes the following practices:

1. **STIR/SHAKEN Implementation.**

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2. Know-Your-Customer (KYC) / Know-Your-Upstream Procedures

- Customers of JLink are only customers that are already a client for other IT services. We will have intimate knowledge of the customer's business practices, needs, and members of the business.
- All new and renewing customers undergo identity verification prior to activation. Verification includes:
 - Submission of valid business identification (e.g., Articles of Incorporation, tax ID).
 - Confirmation of service use-case and business justification.
 - JLink will use third party vendors and web sites, such as Experian Business Verification, Better Business Bureau, and the local Corporation Commission standing for customer analytics and identity verification to enhance fraud detection and ensure compliance.
- Contracts explicitly prohibit originating unlawful robocalls and spoofed traffic.
- Approved customers are added to our system and monitored continuously for compliance. Any suspicious activity triggers review and potential termination of service.

3. Know your Upstream Provider

- JLink only uses one upstream provider, Voip Innovations. We have verified they are appropriately on the robocall mitigation database.

4. Call Analytics and Monitoring

- We monitor call patterns for high-volume, short-duration, or suspicious traffic.
- Automated detection tools flag abnormal traffic patterns.
- Calls identified as potentially unlawful are investigated and may be blocked.

5. Contractual Controls

- All customer contracts include:
 - Prohibitions on unlawful robocalling.
 - Termination rights for violation of robocall rules.

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- Obligations to cooperate in traceback and investigations.

6. Blocking and Enforcement Actions

- Accounts found to originate illegal robocalls are suspended or terminated immediately.
- Calls identified as illegal are blocked where technically feasible.