



Robocall Mitigation Plan - Gradelink Corporation

Gradelink Corporation (“**Gradelink**”) is a U.S.-based SaaS provider serving the K–12 education market. Gradelink offers a Student Information System (SIS) platform that includes a communications module enabling authorized school administrators to send informational and emergency notification phone calls to faculty, parents, and students. Gradelink does **not** operate telecommunications facilities, does not assign or control telephone numbers, and does not originate calls directly onto the PSTN. All outbound calls are handed off to Gradelink’s upstream voice service provider(s), which apply STIR/SHAKEN signing using their own certificates and attestation policies.

Gradelink maintains the following Robocall Mitigation Program as required under FCC rules for non-facilities-based providers that do not implement STIR/SHAKEN directly.

1. Risk Assessment

Gradelink serves only verified educational institutions. Schools use Gradelink’s platform for routine communications such as announcements, reminders, and closures, and do not originate high-volume or high-risk calling campaigns. Gradelink has no indication of illegal robocall activity occurring on its platform. Based on customer type, usage patterns, and controls described below, Gradelink assesses its risk of originating illegal robocalls as **low**.

2. Customer Due Diligence

Gradelink conducts customer verification and ongoing vetting to ensure platform access is restricted to legitimate educational entities:

- Verification of customer identity and service address at onboarding
- Review of customer information at renewal and when services are added
- Restriction of access to known institutions (no public or open self-signup)
- Enforcement of Terms of Service and Privacy Policies allowing suspension or termination of any customer engaged in prohibited or abusive calling activities

These measures prevent anonymous or fraudulent use of Gradelink’s services.

3. Prevention and Mitigation of Illegal Robocall Origination

Gradelink implements multiple layers of controls to prevent unlawful or fraudulent calling activity:

- **Rate limiting and throttling** to restrict the number and frequency of messages an account may send
- **Acceptable Use Policies** that specifically prohibit illegal or unsolicited calling
- **Monitoring of calling patterns** for anomalies or abuse signals
- **Immediate investigation** of any reports or indicators of suspicious calling activity
- **Suspension or termination** of accounts that fail to remedy identified issues

Gradelink does not perform STIR/SHAKEN signing itself. All outbound calls are passed to upstream provider(s) that apply STIR/SHAKEN attestation using their own signing infrastructure in accordance with FCC requirements.

Gradelink also maintains a secure technical environment, including:

- Regular network vulnerability scans
- PCI compliance audits
- Secure development practices
- Staff training on security and abuse prevention
- Vendor qualification and oversight procedures

These measures minimize the risk of unauthorized access or misuse of the platform.

4. Response to Traceback Requests

Gradelink cooperates fully with traceback requests from the Industry Traceback Group (ITG), law enforcement, and other legitimate authorities. Gradelink has designated a primary and secondary point of contact responsible for responding promptly and coordinating with its upstream provider(s). Gradelink provides information to the fullest extent technically and legally permissible.

5. STIR/SHAKEN Status

Gradelink does not originate calls on its own network and does not operate its own STIR/SHAKEN signing infrastructure. In accordance with **47 C.F.R. § 64.6304**, Gradelink is exempt from direct STIR/SHAKEN implementation. All calls are signed downstream by Gradelink's provider(s) using their certified STIR/SHAKEN implementation.