

Robocall Mitigation Plan (Amended February 2026)

Business Information

Joink, LLC (FRN 0016251530)
834 S 10th Street
Terre Haute, IN 47807

Contact Information

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Overview

In the Commission’s release, In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97 (rel. March 17, 2023) (the “R&O”), all voice service providers (VSPs) must file Robocall Mitigation Plans (RMPs) that describe the provider’s reasonable steps to avoid originating illegal robocalls. The R&O and subsequent Bureau guidance also identify core elements that should be addressed in an RMP, including Know Your Customer (KYC), Know Your Upstream Provider, ownership information, a description of any call analytics used to identify and block illegal traffic, and identification of any third-party vendors.

Purpose

Joink, LLC (“Joink”) is committed to preventing illegal calls from originating on or traversing its network. Joink provides voice services through two environments: (1) residential and small business SIP-ATA services delivered through an upstream provider, and (2) hosted voice services delivered via Joink’s Netsapiens platform. Joink has implemented STIR/SHAKEN for calls delivered via its hosted voice platform to the extent applicable, and for other portions of traffic where Joink cannot directly implement STIR/SHAKEN, Joink relies on upstream providers that perform full STIR/SHAKEN authentication on Joink’s behalf. This plan describes Joink’s mitigation measures.

Know Your Customer (KYC)

Joink verifies the identity of each subscriber prior to service activation. Joink provides service to on-net customers whose premises have been visited for installation of facilities.

Joink collects and maintains, as applicable, the customer's name, service address, and for business customers, the nature of the customer's business. Joink's service activation processes are designed to ensure that only legitimate customers obtain service.

Know Your Upstream Providers

Consistent with the Commission's directives, Joink maintains current information on its upstream providers and coordinates with those providers to mitigate illegal robocalls, including cooperation with traceback requests. Joink's upstream providers include:

Big River Telephone Company, LLC
24 S Minnesota
Cape Girardeau, MO 63702
Kelly Krauska
krielhlman@bigrivercom.com

Bandwidth Inc.
2230 Bandmate Way
Raleigh, NC 27607
Kellen Foster
kfoster@bandwidth.com

via an agreement entered by Joink's wholly owned subsidiary, Computer Techniques, LLC:

Computer Techniques, LLC
520 N Cheney St
Taylorville, IL 62568
Aaron Bialas
aaron.bialas@cticomputers.com

Joink's upstream providers are listed as STIR/SHAKEN compliant in the FCC Robocall Mitigation Database.

Acceptable Use Policy (AUP)

Joink maintains an Acceptable Use Policy that subscribers must accept. The AUP prohibits illegal robocalling and other abusive uses of the network. See <https://www.joink.com/acceptable-use-policy/>

Analytics for Monitoring Traffic

Joink works with its upstream providers and monitors traffic to identify patterns indicative of illegal robocalls. These efforts may include automated and manual monitoring techniques, including call analytics and traffic pattern analysis to identify high-volume, anomalous, or otherwise suspicious calling behavior. Monitoring may include verification of caller ID usage, number validity checks, review of traffic sources, and analysis of calling patterns using third-party analytics tools and internal network monitoring systems. Joink's terms permit immediate suspension or termination in response to illegal use.

Investigation of Suspicious Activity

If traffic patterns suggest potential illegal robocalls, Joink and/or its upstream providers will investigate the activity to determine the source and nature of the calls. Investigative steps may include identification of the originating party, verification of number authorization, review of customer records, consultation with upstream providers, and participation in industry traceback efforts. Joink will take appropriate action based on the results of the investigation, which may include suspension or termination of the ability to originate calls.

Blocking

Joink cooperates with the Industry Traceback Group (ITG) and applicable authorities, honors Do-Not-Originate (DNO) requests, and documents and retains records of requests received and mitigation actions taken in response to traceback, law enforcement, or regulatory inquiries consistent with applicable law and internal retention policies. Joink commits to responding as promptly as possible, and in all cases within twenty-four (24) hours, to traceback requests received from the Federal Communications Commission, law enforcement, and the Industry Traceback Group (ITG), and to cooperating fully in any related investigations, including coordination with upstream providers where appropriate. Based on the nature and severity of the identified activity, Joink may implement appropriate mitigation measures, including temporary or permanent blocking of traffic, suspension of originating privileges, escalation to upstream providers, or termination of service, as permitted under its terms and acceptable use policies.

Plan Updates

Joink will monitor industry best practices and update this plan as needed. In the event of a material change, Joink will disseminate the updated plan to employees, consultants, and contractors and file any required update to the FCC Robocall Mitigation Database within ten (10) days.

STIR/SHAKEN Implementation Status

Joink provides voice service through two environments:

- Residential/small business SIP-ATA services delivered through an upstream provider that performs STIR/SHAKEN on Joink's behalf; and
- Hosted voice services delivered via Joink's Netsapiens platform, for which Joink has implemented STIR/SHAKEN consistent with industry standards.

Accordingly, Joink's Robocall Mitigation Database filing reflects that Joink has implemented STIR/SHAKEN in the IP portions of its network and relies on upstream providers for other portions where direct implementation is not feasible.

Certification of Tim Moran

I, Tim Moran, Chief Financial Officer of Joink, LLC (“Joink”), do hereby certify, under penalty of perjury, the following:

1. Joink has implemented STIR/SHAKEN for calls delivered via its hosted voice platform to the extent applicable, and for other portions of traffic Joink relies on upstream providers that perform STIR/SHAKEN on Joink’s behalf.

2. Joink’s business name and primary address are:

Joink, LLC
834 S 10th Street
Terre Haute, IN 47807

3. Joink’s primary contact for robocall mitigation is identified above in this plan.

4. Joink’s ownership information is on file with the Commission, where required.

5. Joink is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

6. Joink has not been subject to Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

7. Joink’s role in the call chain is that of a voice service provider; Joink implements STIR/SHAKEN in applicable IP portions of its network and relies on compliant upstream providers for other portions.

A handwritten signature in black ink, appearing to read "Tim Moran", is written over a horizontal line.

Tim Moran
Chief Financial Officer
Joink, LLC

Date: February 16, 2026