



Lingo Management, LLC.
Robocalling Mitigation Plan - January 2026



Consistent with the rules and regulations of the Federal Communications Commission (“FCC” or “Commission”), Lingo Management, LLC (“Lingo”) submits this certification and the following Robocall Mitigation Plan (“RMP”). 47 C.F.R. § 64.6305(d)(1), (2). Lingo’s Robocall Mitigation Plan details the policies and practices that it has established in Lingo’s capacity as a voice service provider with a STIR/SHAKEN implementation obligation.¹ Lingo is not a foreign voice service provider, and its company information, including a list of its affiliates, subsidiaries, parent companies, associated FCC Registration Numbers (“FRNs”), and Operating Company Numbers (“OCN”), is provided as Exhibit A to this RMP. A list of Lingo’s principals is provided as Exhibit B.

Unless otherwise specified, this RMP applies to all of Lingo’s calling platforms and its affiliates.²

Company Summary

Lingo provides IP-based Cloud voice and data along with other unified communications technologies to small-to-medium sized businesses and consumers. Based in Detroit, MI – Lingo has a nationwide network that includes 2POPs.

Certification

As certified in the FCC’s Robocall Mitigation Database (“RMD”):

- In its capacity as a voice service provider, Lingo has fully implemented the STIR/SHAKEN authentication framework across its network. Lingo fully implemented the STIR/SHAKEN authentication framework in June 2021, it has an STI Agreement, and has acquired a Service Provider Code (“SPC”) Token. In addition to its existing procedures under the STIR/SHAKEN authentication framework, Lingo incorporates by reference into this RMP the additional procedures outlined in DA 24-790, Attachment 1: Operating Procedures.³
- Lingo has implemented and taken specific reasonable steps to avoid carrying or processing illegal robocall traffic as part of its RMP, which describes how it has complied with the FCC’s know-your-upstream provider requirements.
- Lingo commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.⁴
- All calls that Lingo originates on its network in its capacity as a voice service provider are subject to this RMP.

¹ 47 C.F.R. §§ 64.6305(d)).

² See, *Wireline Competition Bureau Announces Robocall Mitigation Database Filing Deadlines and Instructions and Additional Compliance Dates*, Public Notice, DA 24-73, p. 6 (2024) (stating that a “provider that plays more than one role in the call chain need only submit a single mitigation plan, but should explain the mitigation steps it undertakes in each role, to the extent those mitigation steps are different.”) (“RMD Public Notice”).

³ See Order and Consent Decree, *Lingo Telecom LLC*, DA 24-790 (Aug. 21, 2024) (“Consent Decree”).

⁴ 47 C.F.R. §§ 64.6305(d)(2)(iii).



- No prior Lingo RMD certification has been removed by FCC action and Lingo has not been prohibited from filing in the RMD.
- Lingo has been the subject of formal Commission and law enforcement action regarding apparently illegal robocall traffic. These items are summarized below.
 - On February 6, 2024, Lingo received correspondence from the FCC’s Enforcement Bureau regarding a Notice of Suspected Illegal Traffic (“FCC Letter”).⁵ The FCC Letter disclosed Lingo’s apparent origination of suspected illegal robocalls that played an apparently deepfake prerecorded message from a voice that was artificially created to sound like a candidate for public office. Lingo fully cooperated with the FCC, and within receipt of the FCC Letter, Lingo responded to the Commission within 48 hours and fourteen days of receipt, as directed. Lingo is continuing to cooperate in the investigation, and no final determinations have been issued.
 - On November 3, 2023, the Anti-Robocall Multistate Litigation Task Force (“Task Force”) issued Lingo a notice letter that directed Lingo to take steps to prevent its network from being used as a source of apparently illegal robocalls. (“Task Force Letter”).⁶ The Task Force Letter directed Lingo to scrutinize and actively investigate suspected illegal call traffic that may be transiting Lingo’s network. Lingo is cooperating with the Task Force, and no final determination has been issued.⁷
 - On February 6, 2024, the FCC issued Lingo Telecom, LLC (“Lingo Telecom”), a Cease and Desist letter (“FCC Letter”).⁸ The FCC Letter stated that Lingo was allegedly originating spoofed robocalls that included a deepfake generative Artificial Intelligence (“AI”) voice purporting to be from a political candidate (“AI Robocalls”). Lingo cooperated with the FCC and responded to the FCC Letter within the prescribed timeframes.
 - On May 23, 2024, the FCC adopted a Notice of Apparent Liability pertaining to Lingo Telecom and the AI Robocalls (“FCC NAL”).⁹ The FCC NAL alleged that Lingo Telecom failed to properly authenticate caller ID information associated with the AI robocalls.

⁵ See Letter from Loyaan A. Egal, Bureau Chief, Enforcement Bureau, FCC, to Alex Valencia, Chief Compliance Officer, Lingo Telecom, LLC (Feb. 6, 2024) (“FCC Letter”).

⁶ See Letter from Tracy Nayer, Special Deputy Attorney General, Consumer Protection Division, North Carolina Department of Justice, to Alex Valencia, Chief Compliance Officer, Lingo Telecom, LLC (Nov. 3, 2023).

⁷ As noted in the FCC Letter, on August 1, 2022, the Task Force issued Lingo a Civil Investigative Demand (“CID”). See Letter from Douglas Swetnam, Section Chief, Privacy and Identity Theft Unit, Office of the Attorney General, State of Indiana (Aug. 1, 2022). The CID sought certain documents and information from Lingo, which the company timely provided pursuant to a negotiated production schedule. Lingo is cooperating with the Task Force, and no final determination has been issued. As noted in the FCC’s Sixth Report and Order, issuance of a CID does not trigger a disclosure obligation since it is “not accompanied by findings of actual or suspected wrongdoing.” FCC 23-18, ¶ 47. However, in the interest of transparency, Lingo discloses it in its RMP.

⁸ See Letter from Loyaan Egal, Regional Director, Bureau Chief, Enforcement Bureau, FCC, to Alex Valencia, Chief Compliance Officer, Lingo Telecom (Feb. 6, 2024).

⁹ See Notice of Apparent Liability, *Lingo Telecom, LLC*, FCC 24-60 (2024).



- On August 21, 2024, Lingo entered into a Consent Decree with the FCC regarding the FCC NAL (“Consent Decree”).¹⁰ The Consent Decree contains no findings of any rule violations, and Lingo Telecom voluntarily agreed to implement additional measures to further supplement its existing robust robocall mitigation procedures. As part of the Consent Decree, the FCC agreed to terminate its investigation into the AI Robocalls.
- On December 10, 2024, the FCC’s Enforcement Bureau released an Order identifying voice providers that were required to update their RMD certifications.¹¹ Consistent with the Order, Lingo updated its RMD certification accordingly.

Internal Organizational Staff and Resources

Internal Organizational Staff. Lingo personnel from four different company departments – including Compliance, the Sales and Marketing Group, Customer Service Department, and Network & Operations– are involved in implementing Lingo’s robocall and know your customer protocols, which are discussed in greater detail below. All four departments also have at least one member assigned to Lingo’s Robocall Mitigation Team.

- In the *Compliance Department*, there are three employees involved in the creation of and implementation of robocall mitigation and know your protocols, including Lingo’s Chief Compliance Officer, as well as the Department’s Compliance Paralegal (and Robocall Mitigation Contact) and Regulatory Manager. All three are also assigned to Lingo’s Robocall Mitigation Team.
- In the *Sales and Marketing Group*, there are four employees involved in implementing Lingo’s know your customer requirements. These employees include our Chief Revenue Officer and senior managers involved in establishing processes to ensure all enterprise customers complete the KYC forms and other various responsibilities, including strategic projects, account management, and business development. All personnel are also members of the Robocall Mitigation Team.
- In the *Customer Service Department*, there are four employees involved who oversee Lingo’s traceback and robocall mitigation communications with customers. These employees include our VP and Senior Director of Client Services. All personnel are also members of the Robocall Mitigation Team.
- In the *Network & Operations Department*, there are three employees involved in implementing Lingo’s network robocall compliance requirements. These employees include Lingo’s Chief Operating Officer, senior executive, and managers with extensive telecommunications network and engineering experience. All of these employees are also on the Robocall Mitigation Team.

¹⁰ See *Consent Decree*.

¹¹ Order, *2,411 Robocall Mitigation Database Filers*, EB-TCD-24-00036891, DA 24-1235 (rel. Dec. 10, 2024).



Robocall Mitigation Plan - Know Your Customer Protocols for Enterprise Customers

- Lingo has implemented protocols to investigate and vet enterprise customers that it contracts with to accept traffic on its network. This framework, which includes new and renewing customers, is implemented by Lingo via a contract ticketing system that requires review from Lingo's legal, regulatory, finance, and sales departments. The contract ticketing system provides a central depository for all review documents and notes, and includes automated alerts to each member of the review process as laid out in the steps below:
 - Step 1 – Enterprise sales team creates contracts, reviews the ticket, and uploads the draft agreement with relevant customer information. This process creates a ticket number, and the contract management team then assigns the ticket to relevant team members.
 - Step 2 – Enterprise customers must complete enhanced KYC forms and a D&B review, and may also go through a review of credit, banking information, and customer references.
 - Step 3 - Legal and Regulatory reviews all contract terms to ensure they meet regulatory requirements, including language to take immediate action against transmission of fraudulent illegal robocalls, which includes immediate suspension or termination. Regulatory also provides a review to ensure the customer is not a part of any state or federal investigation, or any cease and desist or enforcement order. Legal provides additional review of domestic and foreign tax data and registrations, as well as exemption data. Once this information is verified by the Legal Department, final legal approval is given to sign the agreement.
 - Step 4 – Final review and signature by a Lingo senior employee.
 - Step 5 – Contracts management team members review the file to ensure fully executed agreement is on file along with all required tax documents and exemption forms, as well as KYC forms as necessary. Ticket is then closed and contract is uploaded in company's contracts management system.
 - Step 6 – Regulatory department provides an annual review of tax exemption certificates. Lingo also provides annual Know Your Customer forms for all enterprise customers with SIP trunks.



Robocalling Mitigation Plan – Robocall Mitigation Operational Procedures

- Robocall Mitigation Team Reviews
 - Daily Activities: Review of any enforcement action or cease and desist order, and ongoing monitoring of state and federal regulatory enforcement actions. Daily review of Tracebacks and responses. 24 hour, seven days a week network monitoring
 - Monthly Team Call: As part of its monthly team meetings, Lingo reviews current robocall regulations and industry data in order keep its policies and measures updated to combat robocall campaigns, including monthly review of all tracebacks and any FCC Enforcement Orders for current campaigns. In addition, the team reviews products and services to enhance its ability to get robocall compliance analytic data to help monitor its network to increase its ability to deter and prevent illegal robocalls from entering its network.
 - Quarterly Tracebacks Review: Review tracebacks and campaigns, as well as updates to traceback protocols:
 - Any FCC Enforcement Notice/Campaign Alert requires immediate suspension of any non-Tier One carrier trunk group that has multiple tracebacks in a month. Requires 24-hour response to review and mitigation efforts for team review.
 - Review with appropriate managers for any customer that has shown multiple tracebacks or requires advanced monitoring.
 - Quarterly Attestation Review: Team will review any customer and customer traffic that may need an updated attestation level or will require a separate attestation level for any new trunks.
 - Semi-annual RMD Review: Lingo reviews all interconnecting providers from whom it receives voice traffic to ensure they are in the FCC's RMD.
 - Tax Data Review: All providers are required to provide updated tax and exemption data.



Robocalling Mitigation Plan – Reporting and Tools

- Monthly Analytical Reporting
 - Lingo utilizes robocall analytics data from its internal reports and monthly DNO utilization. In addition, Lingo reviews and augments the tools/processes below from its technology vendors to include in these monthly analytics reports or as an added analytical tool in support of our robocall mitigation efforts.
 - Key Statistics:
 - CPS: Call Per Second
 - ASR: Answer Seizure Ratio
 - DNO List
 - Numbers of Calls based of ANI
 - SIP Release Codes: SIP 503 Normal, SIP 600 Malformed ANI, SIP 602 Invalid ANI, SIP 604 Do Not Originate, SIP 605 Medium Risk, SIP 607 Black Listed ANI, SIP 608 High Risk, SIP 487

Robocalling Mitigation Plan – Network Monitoring

Internal Organizational Resources. Lingo monitors its network traffic to identify and mitigate illegal robocalls through various organizational frameworks and third-party tools. Among the metrics utilized by Lingo to identify suspected illegal robocall traffic through its Vendor Tools are those relating to call attempts, answer seizure ratios (“ASR”), fail call ratios (“FCR”), average call duration (“ACD”), and average post dial delay (“APDD”). Lingo has also established two dedicated departments whose responsibilities include monitoring for and addressing suspected illegal robocall traffic: 1) the Network Operations Center (“NOC”); and 2) the Robocall Mitigation Team (“RMT”).

The NOC is operated on a 24/7/365 basis by Lingo personnel, with additional support from third-party consultants. Issues involving call quality may get escalated from the NOC to the Impact Technical Assistance Center for research.

As part of its network monitoring efforts, NOC personnel regularly interact with external parties, including but not limited to interconnecting carriers (both downstream and upstream), as well as representatives from the FCC’s designated Traceback Consortium, the ITG. The NOC also works closely and regularly with Lingo’s staff assigned to Lingo’s RMT. As part of its RMP, Lingo undertakes various measures. A general overview of some of these measures is provided below.

First, staff from the NOC and the RMT regularly coordinate to address any Tracebacks received from the ITG.



Second, the NOC generates network monitoring reports that includes information on daily release codes by customer and vendor. The report includes information on SIP release codes 587 (request terminated) and 403 (request forbidden).

Third, in instances where the NOC identifies suspected illegal robocall traffic, it will often engage the RMT for escalation purposes. Where such escalations occur, the RMT will coordinate with the NOC and other Lingo personnel to both address the traffic at issue and pursue remediation efforts, as appropriate, up to and including termination of a customer.

Fourth, Lingo verifies that voice service providers from which it receives traffic are registered in the FCC's RMD. Consistent with the FCC's regulations, Lingo will not accept traffic from a voice service provider lacking such a certification in the RMD.

Finally, in instances where an existing Lingo customer receives multiple Tracebacks or separate complaints associated with its traffic, the RMT will coordinate with the respective account manager for that customer. This elevation process helps to ensure that both the customer and account manager are made aware of suspicious traffic and that where necessary, appropriate mitigation measures are implemented.



Robocalling Mitigation Plan – Call Analytic Tools

- Lingo has a variety of call analytic tools which provide Lingo with the ability to investigate call traffic for fraudulent use and suspected robocalling activity. Lingo utilizes various third-party vendors in its platform for comprehensive call analysis. The five third-party vendors utilized by Lingo are: (1) Sansay; (2) OpenNMS; (3) Reshift; (4) NetSapiens, and (5) BroadSoft. Listed below are the areas these five vendors supply Lingo with various tools to monitor and mitigate illegal robocalls.
 - **Fraud Detection.** The tools utilized by Lingo enable it to detect and investigate suspected fraudulent call traffic. The platform alerts, documents, reports, and automatically blocks detected call patterns typical of suspected fraudulent activity.
 - **Call Traffic Diagnostics.** Lingo's third-party tools provide the company with call traffic search and diagnostic tools containing a range of signaling and user plane call analysis for VOIP SIP traffic. The capabilities include analysis of message decodes, per call or session quality, call/session traces, and service performance quality metrics. The platform also actively monitors and sends call activity alerts to Lingo's NOC based on call quality performance metrics.
 - **Network Monitoring.** Lingo's NOC also utilizes a network monitoring tool for centralized performance monitoring and call traffic performance alerting. The Lingo NOC receives call network events from all sources to manage call quality as reported by automated systems. These events and performance metrics enable Lingo to analyze and investigate issues as reported by customers and vendors.
 - **Trunk Route Management and Monitoring.** Lingo also utilizes a third-party tool for call carrier trunk route management and monitoring. The monitoring includes the ability to research call trunk-level performance metrics including call attempts (CA), ASR, FCR, ACD, and APDD. A related tool monitors Lingo's SIP network for overall system health, and interacts with a separate risk mitigation solution to help Lingo research suspected fraudulent robocalls.
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Robocalling Mitigation Plan – Additional Procedures

Lingo's RMP also includes additional procedures that are designed to mitigate the origination of illegal robocalls. These procedures include, but are not limited to, the following components.

- **Customer Education and Monitoring.** In targeted instances involving enterprise customers with certain trunking products, Lingo will: (1) issue a notice to all such customers reminding them of their obligations under both the Telephone Consumer Protection Act ("TCPA") and the Truth-In-Caller ID Act; and (2) monitor such customers closely and issue warnings where appropriate about their obligations to obtain prior express consent and make the disclosures required for artificial or prerecorded voice calls under the TCPA's rules.¹²

¹² See 47 C.F.R. § 64.1200(b)(1)-(2).



- **KYC Protocols and Contracts for Enterprise Trunking Customers.** Lingo has amended its know-your-customer forms and customer contracts for enterprise customers that have certain trunking products, and will require customers making certain calls to: (1) develop and maintain company-specific do-not-call lists, consistent with Section 64.1200(d) of the FCC's rules;¹³ (2) develop automated opt-out mechanisms when making artificial or prerecorded voice calls; (3) develop a system to honor and track reasonable opt-out requests; (4) document prior express consent; and (5) submit documentation to Lingo evidencing compliance with such requirements upon request.

Designated Employee Responsible for Addressing Robocall Mitigation-Related Issues

The name, title, department, business address, telephone number, and email address of the person within Lingo responsible for addressing robocall mitigation-related issues, to include traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies, is as follows:

Contact Name: Angela Howard
Contact Department: Compliance Department
Contact Title: Compliance Paralegal
Contact Street: 25925 Telegraph Rd., Suite 210
Contact City: Southfield
Contact State and Zip Code: MI 48033
Contact Telephone Number: 470-401-0324
Contact Email: angela.howard@lingo.com; regulatory@lingo.com

¹³ See, *id.* § 64.1200(d).



Exhibit A
Company Information

Company Name	DBAs & Former Business Names	Category	FRN	OCNs
Lingo Management, LLC ¹⁴		Parent	0025705617	
Tempo Telecom, LLC ¹⁵		Subsidiary	0004333068	
Lingo Telecom of the West, LLC	Fka Birch Telecom of the West, LLC.	Subsidiary	N/A	215J 216J 217J 218J 219J 220J 214J 223J
Lingo Communications of Kentucky, LLC	Fka Birch Communications of Kentucky, LLC.	Subsidiary	0022823819	215H 216H 217H
Lingo Telecom, LLC	Fka Matrix Telecom, LLC.; dbas: Lingo, BullsEye, ExcelTelecommunications, Trinsic, Vartec Telecom, Americatel, Startec	Subsidiary	0032545006	0001 0006 0008 000A 0123 0155 025C 0326 0327 0333 0337 033A 5568

¹⁴ Lingo Management, LLC. is a wholly owned subsidiary of BRPI Acquisition Co., LLC., which in turn is one hundred percent owned by B. Riley Financial, Inc. a publicly traded corporation.

¹⁵ Tempo Telecom, LLC (“Tempo”) is a reseller, that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, Tempo is exempt from the FCCs STIR/SHAKEN rules. *See e.g., In the Matter of Call Authentication Trust Anchor*, Report and Order and Further Notice of Proposed Rulemaking, FCC 20-42, ¶ 40 (2020) (clarifying that the FCC’s STIR/SHAKEN implementation obligation does “not apply to providers that lack control of the network infrastructure necessary to implement STIR/SHAKEN.”); *see also, In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, FCC 23-18, ¶ 40, fn. 158 (2023) (discussing the RMD filing obligations for “voice service providers without a STIR/SHAKEN implementation obligation”, and citing to resellers as an example.).

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Lingo Telecom of Virginia , LLC	Fka Matrix Telecom of Virginia, LLC.	Affiliate ¹⁶		

¹⁶ Lingo Telecom of Virginia , LLC is a subsidiary of Lingo Telecom, LLC.



Exhibit B
Company Principals

Name	Position
Ananth Velupillai	Chief Executive Officer
Vilas Uchil	Chief Operating Officer
Christopher Ramsey	Chief Revenue Officer
Alex Valencia	Chief Compliance Officer
Curt Varner	Chief Technology Officer
Danilo Cruz	VP, Controller
Jamie Sark	VP, Sales Operations
Patryk Szpakowski	VP, Information Technology
Mathew Downey	VP, Finance
Greg Corwin	Sr. Director, Marketing
Diana Bratu	Assistant Controller