

Robocall Mitigation Plan (RMP)

Company Name: VIRELINK LLC

Address: 400 Plaza Dr, Secaucus, NJ, 07094

1. Identification and Registration

- VIRELINK LLC is a voice service provider engaged in providing telecommunications services.
- As a voice service provider, VIRELINK LLC is listed in the FCC Robocall Mitigation Database under its FRN: 0036666931

2. STIR/SHAKEN Implementation

- VIRELINK LLC fully implements STIR/SHAKEN protocols for all calls originated or passed through its network.
- All calls are verified using signed certificates and authenticated via the STIR/SHAKEN framework to reduce the likelihood of spoofed caller ID.

3. Customer Onboarding and Vetting

- VIRELINK LLC conducts thorough Know Your Customer (KYC) due diligence when onboarding new customers.
- Each customer's identity, business purpose, and calling patterns are verified before service is activated.
- Customers are required to comply with all applicable laws, including the Telephone Consumer Protection Act (TCPA) and the Truth in Caller ID Act.

4. Call Monitoring and Analytics

- VIRELINK LLC uses real-time analytics tools to monitor outbound calls and detect anomalous calling patterns indicative of potential robocall activity.
- Suspicious calling behavior is escalated immediately to compliance teams for further investigation.

5. Upstream Provider and Vendor Vetting

- VIRELINK LLC ensures that any upstream providers or partners we utilize are also registered in the RMD and adhere to robocall mitigation measures.
- VIRELINK LLC requires contractual assurances from upstream providers that they comply with FCC rules, including no originations of unlawful robocalls.

6. Traceback Cooperation

- VIRELINK LLC commits to responding to any traceback requests from the Industry Traceback Group (ITG) within **24 hours** of receiving such requests.
- A dedicated compliance team is available to assist the ITG in identifying the source of any suspected unlawful robocall campaigns.

7. Recordkeeping and Documentation

- VIRELINK LLC maintains all records related to customer onboarding, call analytics, and traceback cooperation for a minimum of two years.
- These records will be made available to the FCC or authorized agencies upon request.

8. Enforcement and Termination of Service

- VIRELINK LLC reserves the right to suspend or terminate service if a customer is found to be engaged in illegal robocall activity.
- If a customer is found violating the mitigation plan or FCC rules, VIRELINK LLC will promptly disconnect the service and notify the appropriate regulatory authorities.

9. Updates and Review

- VIRELINK LLC will review and update the Robocall Mitigation Plan annually or as required by FCC rule changes.
- Any significant changes in mitigation measures will be promptly reflected in the Robocall Mitigation Database.