

Robocall Mitigation Program Description

Provider Name: Datalink Systems LLC

FCC FRN: 0037298015

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1. STIR/SHAKEN Implementation

Datalink Systems LLC provides VoIP services using the **Commio platform and the Telnyx platform**, which have implemented the **STIR/SHAKEN framework** for SIP-based call authentication.

- All IP-originated calls are authenticated and signed in accordance with FCC requirements.
 - Signed calls are validated upon receipt where supported by upstream and downstream carriers.
 - For any non-IP interconnections, we rely on Commio or Telnyx's carrier relationships and continue to support the transition toward all-IP connections to extend STIR/SHAKEN coverage.
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2. Robocall Mitigation Practices

For traffic not authenticated by STIR/SHAKEN (such as non-IP interconnections), Datalink Systems LLC maintains the following mitigation practices to prevent the origination of illegal robocalls:

- **Know Your Customer (KYC):** We require all new customers to provide valid business information, including EIN/Tax ID and service use case before service activation.
- **Customer Screening:** We prohibit the sale of services to entities known for robocall activity or those previously flagged in traceback efforts.
- **Call Pattern Monitoring:** Commio and Telnyx monitor call traffic for unusual patterns such as:
 - High call attempts with low answer or completion rates.
 - Sequential dialing or calls to unassigned number ranges.
 - Abnormally short-duration, high-volume calls.

- **Enforcement Actions:** If suspicious or unlawful traffic is identified, accounts may be immediately suspended or terminated. Violations are escalated internally to our compliance team and remediated promptly.
 - **Traceback Participation:** We respond promptly to traceback requests from the **Industry Traceback Group (ITG)**, regulators, and law enforcement – typically within 24 hours.
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3. Ongoing Compliance

- We contractually require all customers to comply with applicable FCC rules and explicitly prohibit the origination of illegal robocalls.
 - Our compliance staff performs **regular reviews of traffic** and investigates anomalies flagged by Commio or Telnyx's monitoring systems.
 - We actively cooperate with Commio or Telnyx's and other carriers in addressing robocall complaints and preventing unlawful use of the platform.
 - This program description will be updated if there are material changes to our robocall mitigation efforts.
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4. Certification

Datalink Systems LLC certifies that it has implemented the above-described robocall mitigation program and, through its partnership with Commio and Telnyx, has adopted **STIR/SHAKEN** for IP traffic. We remain committed to preventing the origination of illegal robocalls and maintaining compliance with **FCC 47 CFR § 64.6305**.

Signed,

Mordechai Manies

President

5/29/2026