

Comlynkco LLC

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Comlynkco LLC (“Comlynkco”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of Comlynkco’s implementation of STIR/SHAKEN and the practices and procedures in place to mitigate illegal robocalls. Comlynkco may modify, add, delete, or otherwise alter any of the policies and procedures described in this plan at any time in order to respond to changes in its business, capabilities, and needs.

Comlynkco has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action, and none of its prior certifications have been removed by the Commission. Comlynkco has not, at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation regarding the origination, encouragement, or facilitation of illegal robocalls or spoofing, nor has it had a deficient Robocall Mitigation Database certification.

STIR/SHAKEN Implementation

Comlynkco will comply fully with all conditions set forth in the FCC’s 2020 Report and Order mandating implementation of the STIR/SHAKEN framework, as well as with the Commission’s rules and policies more generally. Comlynkco:

- Utilizes a managed end-to-end call authentication solution that satisfies FCC STIR/SHAKEN requirements.
- Ensures validation of caller identity information for all outbound calls.
- Adopts standardized authentication and verification protocols in accordance with FCC and ATIS standards.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures Comlynkco has implemented to detect and prevent illegal robocalls on its network. Comlynkco periodically evaluates risks, the effectiveness of its policies, and its mitigation capabilities. Practices may be adjusted as appropriate.

Risk Assessment: Comlynkco is a voice service provider offering a variety of calling services. Its customer base does not typically generate high volumes of traffic, and Comlynkco has not received evidence that robocalls have originated from its network. Comlynkco therefore does not consider its network at high risk of originating illegal robocalls.

Specific Measures to Identify and Prevent Illegal Robocalls

Customer Due Diligence:

- Comlynkco verifies the identity of all new and renewing customers, including business documentation and service addresses.
- Comlynkco reviews customer reputation prior to providing services.
- Comlynkco verifies customer information upon contract renewal or when adding services.
- Comlynkco verifies the right of customers to use telephone numbers presented on calls.
- Comlynkco enforces policies defining circumstances under which service may be denied, suspended, or terminated.

Direct IP Intermediate Carrier Due Diligence:

- Comlynkco ensures that upstream providers comply with FCC rules and are registered in the Robocall Mitigation Database.
- Comlynkco does not accept traffic from providers who are not in the RMD.

Fraud Prevention and Call Blocking Measures:

- Enforceable terms of use and acceptable use policies designed to detect and prevent fraudulent traffic.
- Traffic analytics and fraud detection technologies to monitor for unlawful call origination.
- Default blocking of calls from invalid, unallocated, or Do-Not-Originate (DNO) numbers.
- Detection of high volume short duration (HVSD) traffic and other indicators of fraudulent robocalling.

- Caller ID Name override and subscriber notifications for suspicious or modified calls.
 - Ongoing implementation of advanced blocking strategies as technology evolves.
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Responding to Traceback Requests

- Comlynkco has designated **Tina Swanson** as its dedicated point of contact for Industry Traceback Group (ITG) requests.
 - Comlynkco will respond to all ITG traceback requests within the required **24-hour timeframe**.
 - If a pattern of questionable activity is detected, Comlynkco will require corrective measures by the customer and may suspend or terminate service if issues persist.
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Cooperation with Regulators

Comlynkco cooperates with state and federal regulators to prevent illegal robocalls. Specifically, Comlynkco:

- Responds to valid law enforcement requests.
 - Provides non-proprietary information in response to legitimate inquiries regarding illegal robocalls.
 - Implements mandated robocall mitigation procedures to maximize effectiveness.
 - Responds within 24 hours per the ITG policy to all traceback tickets.
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Measures to Prevent Origination of Illegal Calls

Comlynkco has a rigorous Know Your Customer (KYC) policy to support business and individual customers. Its onboarding process includes thorough pre-sales and reputation checks, collecting information such as:

- Legal business name and form of business
- Federal tax ID
- Nature of business

- Primary contact information
- Service address

All customer relationships are governed by agreements prohibiting resale of services and ensuring use for internal purposes only.

Company Information

Company Name: Comlynkco LLC

Phone: 1-800-748-5495

Address: 5110 28th Street, Grand Rapids, MI 49512, United States

Designated Contact: Tina Swanson

Email: help@comlynkco.com

Conclusion

Comlynkco has deployed call authentication, labeling, and blocking solutions through its providers. It is committed to protecting its networks and consumers from harmful calls. Through robust due diligence, fraud detection, STIR/SHAKEN compliance, and timely cooperation with regulators, Comlynkco continues to take a proactive role in reducing illegal robocalls.