

Robocall Mitigation Plan

Pure Link Group, LLC

Company Information

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1. Overview

Pure Link Group, LLC is a VoIP service provider delivering voice solutions to small and medium-sized businesses nationwide, with primary offices in Las Vegas, Nevada and Honolulu, Hawaii. As part of our compliance with the FCC's call authentication and robocall mitigation rules, Pure Link Group has developed and implemented a Robocall Mitigation Plan to prevent the origination of illegal robocall traffic on our network.

2. STIR/SHAKEN Implementation

- Pure Link Group, LLC has implemented the STIR/SHAKEN call authentication framework on our IP-based voice services.
- All SIP-based calls traversing our network are subject to STIR/SHAKEN signing and verification, ensuring caller ID integrity.
- Calls that cannot be authenticated (e.g., legacy TDM interconnection) are subject to robocall mitigation procedures outlined below.

3. Robocall Mitigation Practices

Pure Link Group employs a multi-layered approach to detect, monitor, and prevent unlawful robocalls:

1. Know Your Customer (KYC) Policy

- We verify the identity and legitimacy of all customers before service activation.
- Business registration documents and valid identification are required.
- Customers suspected of high-volume robocall activity are denied service.

2. Traffic Monitoring & Analytics

- Outbound call patterns are continuously monitored for anomalies, such as:
 - High call volume in short bursts.
 - Sequential dialing patterns.
 - Invalid or unassigned caller ID usage.
- Suspicious traffic is flagged and investigated immediately.

3. Call Blocking & Filtering

- Calls originating from numbers on the FCC's Do-Not-Originate (DNO) list are automatically blocked.
- Fraudulent or high-risk calls identified through analytics are restricted in real time.

4. Customer Enforcement

- Customers found violating our terms of service with unlawful robocalling are suspended or terminated.
 - Repeat offenders are permanently barred from Pure Link Group services.
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4. Enforcement & Compliance

- Pure Link Group designates compliance personnel to oversee robocall mitigation efforts.
 - Suspected illegal traffic is reported to the FCC, industry traceback consortium, and law enforcement as required.
 - Pure Link Group maintains logs of call authentication, blocking events, and investigations for compliance review.
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5. Commitment to Ongoing Protection

Pure Link Group, LLC is committed to combating unlawful robocalls by maintaining strict customer vetting, proactive monitoring, and full STIR/SHAKEN deployment. We will continue to update our policies and technology in alignment with FCC regulations and industry best practices.