

Phone-Link FL LLC
Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Phone-Link FL LLC (“Phone-Link” or “Company”) to mitigate and eliminate illegal robocalling. Phone-Link has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and collaborating with other providers and regulatory agencies to combat fraudulent voice activity.

Phone-Link is a Voice over Internet Protocol (“VoIP”) calling service provider. All telecom services are provided on a resale-only basis. The Company, therefore, is exempt from the requirement to implement STIR/SHAKEN because, as a reseller, it lacks control over the network infrastructure necessary to implement STIR/SHAKEN. *See First Caller ID Authentication Report and Order*, 35 FCC Rcd at 3241, para. 40; 47 CFR Section 64.6304(b).

As further detailed herein, the Company has taken steps appropriate for, and required of, a reseller to mitigate robocalling. As a telecom reseller, the Company is dependent on our underlying providers’ assistance with monitoring their networks for fraudulent voice calling patterns. Our underlying providers are White Label and Viirtue.

Traceback Requests

Phone-Link is dedicated to preventing its network from being used to originate or terminate illegal robocalls.

The Company has established an internal process for handling traceback requests. Upon receipt of a request, the Company will review and investigate the call detail records identified in the request to determine whether the traffic originated from Phone-Link’s network or from non-owned numbers.

If a traceback exposes an existing customer as the source of fraudulent robocalls or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Phone-Link immediately begins rejecting all traffic from the offending customer.

The Company pledges to fully respond to all traceback requests from the Commission, law enforcement agencies, and the industry traceback consortium within 24 hours. Phone-Link is committed to cooperating with these entities to investigate and halt any illegal robocall activities utilizing its services to originate, process, or carry calls.

Phone-Link provides the following name, title, and email address for the individual responsible for handling robocall mitigation efforts and responding to traceback requests from the FCC, ITG, and law enforcement:

Traceback Contact Information

Name	Title	Email address
Juan Pipoli	President	jpipoli@phonelinkfl.com

Telephone Numbers

Phone-Link does not directly obtain or manage numbering resources and does not possess an Operating Number Certificate (ONC). Telephone numbers used by Phone-Link customers are either ported to Phone-Link's platform by submitting a current invoice, security PIN, and a signed Letter of Authorization or obtained through its upstream providers. Phone-Link's upstream providers source and manage all Direct Inward Dialing (direct telephone) numbers assigned to the Company's customers.

International Calling

Phone-Link is not currently an international voice services provider. If at any time Phone-Link decides to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international-originated calls.

Call Blocking / Analytics for Monitoring Traffic

As a reseller, Phone-Link relies on its upstream providers, White Label and Viirtue, to perform network-level call analytics and call-blocking functions. White Label and Viirtue employ advanced analytics tools to identify potentially unlawful activity originating from their retail customers or from the end users of their wholesale customers. These analytics monitor for patterns commonly associated with illegal robocalling, including unusually high call volumes from a single number, excessive short-duration calls, calls that consistently disconnect after one ring, and dialing patterns suggestive of automated campaigns. In addition, their systems flag calls that originate from invalid or unallocated numbers, or numbers contained on the Industry Traceback Group's Do Not Originate (DNO) list.

When White Label or Viirtue's analytics identify such issues, the providers generate an internal report outlining the specific concerns and identifying the wholesale or retail

customer responsible. If the report suggests potential illegal robocall activity by an end user of a wholesale customer, the upstream providers notify that customer's designated contact and require an investigation into the matter, along with updates on (1) the resolution of the issue and (2) the steps taken to prevent recurrence. For suspected illegal activity involving White Label or Viirtue's retail customers, the companies conduct their own internal investigation.

If Phone-Link receives a notification from either White Label or Viirtue identifying potential illegal or suspicious calling activity associated with a Phone-Link customer, Phone-Link will respond consistent with its Terms and Conditions. These Terms and Conditions strictly prohibit the use of Phone-Link's services for deceptive, fraudulent, or otherwise unlawful purposes. Upon receiving a notification, Phone-Link may immediately investigate, issue warnings, suspend or terminate service to the offending customer, and/or report the conduct to the appropriate authorities as necessary.

Know Your Customer

Phone-Link maintains strong customer verification procedures to prevent the onboarding of customers that could potentially engage in illegal robocalling. The Company conducts screening interviews with prospective customers to understand the intended use of Phone-Link services and assess any possible risk associated with their business models.

As part of this process, Phone-Link verifies that customers do not operate outbound call centers and confirms the purpose of use for each end user. In addition, the Company limits the number of outbound lines available to customers as an added safeguard. Phone-Link personnel also conduct onsite visits to verify the physical business location of prospective customers and ensure that their operations are active and consistent with the services requested. During these visits, staff meet with authorized representatives to validate their identity and authority to make decisions on behalf of the business.

Phone-Link rejects any prospect that provides anonymous information, presents mismatched documentation, or fails to cooperate in the verification process. All customers must agree to the Company's Terms and Conditions, which prohibit fraudulent or unlawful use of Phone-Link services. The Company will terminate service to any customer suspected or confirmed to be involved in illegal robocalling.

Know Your Underlying Provider

Phone-Link has master service agreements with its upstream providers and has received assurances from their officials that they will continue to authenticate outbound calls originating through Phone-Link and will abide by the Federal Communications

Commission's caller identification authentication and robocall mitigation rules in all respects when providing voice services to Phone-Link. Phone-Link and its upstream providers have agreed to work together diligently to mitigate illegal robocalls, including cooperating fully when receiving traceback requests.

Ongoing Robocall Mitigation

Phone-Link continuously monitors calling activity by reviewing call detail records and analyzing customer usage patterns for indicators of unusual or suspicious activity. The Company monitors for high call volumes, short-duration calls, sequential dialing, or other patterns commonly associated with illegal robocalls. When Phone-Link or its upstream providers detect unusual or suspicious calling activity, Phone-Link promptly investigates and contacts the customer to verify the legitimacy of the traffic. Customer contracts authorize Phone-Link to suspend or terminate service when illegal or suspicious activity is detected, and the Company takes such action when appropriate to prevent further transmission of potentially unlawful calls.

STIR/SHAKEN Status

Phone-Link does not implement STIR/SHAKEN because it is a non-facilities-based reseller and does not control the underlying network infrastructure. STIR/SHAKEN authentication is performed by the Company's upstream providers. In particular, Viirtue authenticates outbound SIP calls on its network using its own certificates and attestation policies, ensuring that calls originated through its platform are properly signed in accordance with FCC requirements. Phone-Link relies on these upstream authentication processes as part of its overall robocall mitigation program.

Phone-Link Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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