

Robocall Mitigation Program – Voxilinks LLC

This Robocall Mitigation Program (“Program”) describes the policies, procedures, and technical controls implemented by **Voxilinks LLC** to prevent, identify, and mitigate the origination and transmission of illegal robocalls and unlawful caller ID spoofing. This Program is designed to comply with applicable Federal Communications Commission (FCC) requirements, including 47 CFR §64.6305, and relevant industry best practices.

1. Program Objective and Oversight

Voxilinks LLC maintains this Program to promote lawful use of its network and to protect consumers, carriers, and industry partners from fraudulent or abusive calling activity. Internal oversight procedures are in place to ensure compliance with regulatory obligations and to enforce acceptable use standards.

2. Customer Due Diligence and Account Review

Prior to provisioning call origination services, Voxilinks LLC performs customer verification measures to confirm business identity, ownership information, and the intended purpose of the services. Customer accounts are subject to ongoing review, particularly when calling patterns materially change.

3. Caller ID Authentication (STIR/SHAKEN)

Voxilinks LLC has implemented STIR/SHAKEN caller ID authentication on applicable IP-based portions of its network. Eligible calls are authenticated in accordance with ATIS standards. Where full implementation is not technically feasible, alternative mitigation measures are applied to reduce the risk of illegal traffic.

4. Network Traffic Monitoring

Call traffic is continuously monitored using automated systems and manual analysis to detect indicators of unlawful or suspicious robocalling activity. Such indicators may include excessive call volumes, short-duration calls, invalid numbering formats, or other anomalous behavior.

5. Investigation and Mitigation Actions

When suspected illegal robocall activity is identified or reported, Voxilinks LLC promptly initiates an investigation. Based on the findings, mitigation actions may include call blocking, service suspension, account termination, and notification to upstream providers, traceback organizations, or regulatory authorities.

6. Complaint Handling and Traceback Cooperation

Voxilinks LLC maintains procedures to receive and respond to complaints from consumers, carriers, and industry traceback groups. The company cooperates in good faith with traceback requests and takes reasonable steps to prevent recurrence of verified unlawful traffic.

7. Record Retention and Program Review

Records related to customer verification, traffic monitoring, complaints, and enforcement actions are retained in accordance with applicable legal and regulatory requirements. This Program is reviewed periodically and updated as necessary to address evolving threats and regulatory changes.

This Robocall Mitigation Program reflects Voxilinks LLC's ongoing commitment to lawful communications and the integrity of the public switched telephone network.