

Stratalink Telecom LLC

Robocall Mitigation Plan (2026)

I. Regulatory Authority

Stratalink Telecom LLC ("Stratalink") is a voice service provider subject to the Federal Communications Commission's robocall mitigation requirements pursuant to 47 CFR § 64.6305. This Robocall Mitigation Plan outlines the policies and technical controls implemented by Stratalink to prevent the origination and transmission of illegal robocalls on its network.

Under the TRACED Act, robocall violations primarily arise from non-compliance with 47 U.S.C. § 227(b) and 47 U.S.C. § 227(e). Stratalink's mitigation efforts are designed to reasonably reduce the risk of traffic associated with these violations.

II. Know Your Customer (KYC)

Stratalink maintains a documented Know Your Customer (KYC) process for all customers prior to service activation. This process includes verification of business identity, review of intended traffic use, execution of a service agreement, and validation of regulatory compliance documentation, including USF filings where applicable.

III. Acceptable Use Policy

All customers are contractually bound by Stratalink's Acceptable Use Policy (AUP), which strictly prohibits illegal, fraudulent, or deceptive calling practices. Stratalink reserves the right to suspend or terminate service for any violation of the AUP.

IV. STIR/SHAKEN Implementation

Stratalink has implemented the STIR/SHAKEN caller authentication framework across its network. Customers may only originate calls using numbering resources assigned by Stratalink or numbers for which ownership or authorization can be verified.

V. Network Monitoring

Stratalink actively monitors network traffic to detect abnormal calling patterns and potential robocall activity. Monitoring includes traffic volume analysis, answer-seizure ratios, call duration metrics, and complaint tracking.

VI. Traceback Cooperation

Stratalink fully cooperates with traceback requests from the FCC, the Industry Traceback Group (ITG), and law enforcement agencies. The company commits to timely responses and appropriate mitigation actions when illegal traffic is identified.

VII. Ongoing Compliance

Stratalink reviews its robocall mitigation program on an ongoing basis to ensure continued compliance with FCC regulations and evolving industry best practices.

Effective Year: 2026

Prepared by: Stratalink Telecom LLC