

Robocall Mitigation Plan for Marlin Communication Ltd

I. Introduction: Marlin Communication Ltd, recognizes the importance of combating illegal robocalls to maintain the integrity of its network and uphold regulatory requirements. This Robocall Mitigation Plan outlines our commitment to implementing policies and procedures to prevent the origination of illegal robocalls on our network.

II. STIR-SHAKEN Implementation Status: As of the submission of this plan, Marlin Communication Ltd has not implemented the STIR/SHAKEN authentication framework on any portion of its network. However, we are committed to adhering to the policies and procedures outlined in this plan to prevent the origination of illegal robocalls. Our network currently relies on the exemption provided under 47 CFR § 64.6304(d) due to technological limitations.

III. Traceback Requests: Marlin Communication Ltd pledges to cooperate with the FCC, law enforcement, and the Industry Traceback Group (ITG) on all traceback requests and investigations. We commit to dedicating sufficient resources to promptly respond to all traceback requests within 24 hours of receipt. A designated single point of contact is provided within Appendix A for all traceback requests.

IV. Customer Vetting Practices: To prevent illegal robocalls, Marlin Communication Ltd implements rigorous customer vetting practices for all voice service subscribers. This includes residential and business/commercial subscribers, with additional scrutiny for larger businesses. Subscriber vetting involves collecting information such as physical location, contact details, business nature, and conducting background checks where necessary.

V. Telephone Number Validation Practices: We have established procedures to validate the right of customers to use telephone numbers connected to our services. Screening capabilities are in place to ensure that only authorized numbers are allowed to originate calls. This includes both single-line and multi-line telephone systems.

VI. International Call Originators: We provide services to international customers that originate calls to U.S. recipients. We apply enhanced due diligence and monitoring controls to international call originators, including:

- Know-Your-Customer (KYC) identity verification prior to service activation
- Verification of business registration and beneficial ownership
- Review of intended traffic profile and use case
- Contractual prohibition of unlawful robocalling, spoofing, and fraud
- Ongoing traffic monitoring for anomalous volume, patterns, or complaint indicators
- Immediate suspension procedures for suspected illegal or abusive traffic
- Cooperation with traceback requests and law enforcement inquiries

We do not permit anonymous access to U.S. outbound calling services. All international originators are subject to the same robocall mitigation and compliance standards as domestic customers.

VII. Know Your Upstream Provider Procedures: Marlin Communication Ltd maintains relationships with upstream providers to ensure the legitimacy of their services and their commitment to preventing illegal robocalls. Contract provisions are in place to enforce robocall prevention measures.

VIII. Ongoing Robocall Mitigation Practices: We actively monitor network usage and call detail records to detect suspicious activity indicative of illegal robocalls. Upon detection, we take immediate action, including initiating traceback investigations and terminating the ability of offenders to use our network for illegal activities.

IX. Third-Party Analytics: We utilize third-party call analytics to enhance our robocall mitigation efforts. These services include fraud prevention, real-time traffic analysis, blacklisting, whitelisting, and reputation lookup.

Appendix A:

- **Traceback Request Single Point of Contact:**
 - Name: Marlin Support
 - Phone Number: +44 8000 328 274
 - Email Address: support@marlincomms.co.uk
- **Downstream Provider Information:**
 - Name of Upstream Provider: Bandwidth
 - Nature of Business: Wholesale Number Provider and Call Routing
 - Network Location: US, LA and NY
 - Call 855-864-7776 (Opt. 7)
 - Email Address: voicsecurity@bandwidth.com
- **Call Analytics Vendor Name and Description of System:**
 - Vendor: Bandwidth/Tekton
 - Description: Marlin Communication Ltd utilizes third-party analytics jointly provided by Bandwidth and Tekton to support robocall mitigation efforts.

This Robocall Mitigation Plan outlines Marlin Communication Ltd's commitment to combating illegal robocalls and ensuring the integrity of our network.