

Robocall Mitigation Program for Interlink Group

1. Purpose and Scope

This Robocall Mitigation Program (“Program”) outlines the policies and procedures established by **Interlink Group** to prevent the origination of illegal robocalls. As a reseller of 3CX communication systems and **SkySwitch** SIP trunking services, Interlink Group is committed to ensuring that our platforms are not used for illegal or fraudulent voice traffic.

2. Know Your Customer (KYC) Procedures

To mitigate the risk of illegal robocalling, Interlink Group performs due diligence on all new and existing customers before provisioning voice services. Our KYC procedures include:

- **Identity Verification:** Collecting and verifying legal business names, physical addresses, and tax identification numbers (EIN) for all entities.
- **Service Intent Review:** Evaluating the customer’s intended use of the 3CX and SkySwitch services to identify high-risk traffic profiles (e.g., telemarketing or high-volume automated dialing).
- **Credit/Business History:** Reviewing the business standing of the customer to ensure they are a legitimate enterprise.

3. Monitoring and Pattern Analysis

Interlink Group leverages the advanced analytics and monitoring tools provided by our upstream partner, **SkySwitch**, to identify suspicious calling patterns. This includes:

- **Short Duration Calls:** Monitoring for high volumes of calls lasting less than 6 seconds, which often indicates automated dialing.
- **Unallocated Numbers:** Tracking high rates of calls made to non-existent or unallocated phone numbers.
- **Call Volume Spikes:** Investigating sudden, unexplained increases in outbound call volume from a single 3CX instance.

4. STIR/SHAKEN Implementation Status

Interlink Group facilitates the implementation of STIR/SHAKEN through our upstream carrier relationship.

- **Carrier Compliance:** We rely on **SkySwitch** to perform the technical "signing" and attestation of calls (Level A, B, or C) as the primary voice service provider.

- **Technical Configuration:** Interlink Group ensures that all **3CX** PBX configurations are optimized to pass necessary SIP Header information to SkySwitch, ensuring that legitimate caller ID information is preserved and authenticated.

5. Enforcement and Termination

Interlink Group maintains a "Zero Tolerance" policy for illegal robocalling. If suspicious activity is detected:

- **Immediate Suspension:** We reserve the right to immediately suspend SIP trunking services for any customer found to be in violation of the TCPA or FCC regulations.
- **Traceback Cooperation:** Interlink Group fully cooperates with the Industry Traceback Group (ITG) and law enforcement to identify the source of illegal traffic.
- **Contractual Protections:** Our Service Level Agreements (SLAs) explicitly prohibit the use of our services for illegal robocalling, providing clear grounds for permanent service termination.