

Robocall Mitigation Plan

Company Name: Kinex Telecom, Inc. **499 Filer ID:** 827027

Company Address 717 E 3rd Street
Farmville, VA 23901

Company Contact: Scott Chidester **Contact Title:** Systems Engineer

Contact Phone: 434-392-4804 **Contact E-mail:** schidester@kinextel.net

Type of Voice Customers: ☒ Residential ☒ Enterprise Business ☐ Wholesale

Voice Service Provided Via ☐ Own NXXs ☒ Leased DIDs

STIR/SHAKEN Certificate: ☐ Use own ☒ Use 3rd party provider's

Routing ☐ Via direct network connections
☐ Via 3rd party network connections
☒ Via DID provider's network connections

Before Service is Established for a New Customer

Customer Vetting Description	
Residential	Kinex Telecom verifies new residential customers by only allowing in-person sign ups and address verification in our service areas. Phone services are installed by a Kinex Technician and not self-installs.
Enterprise Business	Kinex Telecom verifies new business customers via Tax identification number and address verification and by only providing service installations by Kinex Technicians and not self-installs.
Wholesale (another company reselling your services)	N/A (we do not provide wholesale services)

Provisions regarding Traceback in Contracts

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Residential	Kinex Telecom requires customer assistance in all traceback requests, in addition to signing the entirety of the contract signers must initial that they have read and understand that they will be required to participate in any and all traceback investigations involving the Kinex Telecom voice network.
Enterprise Business	Kinex Telecom requires customer assistance in all traceback requests, in addition to signing the entirety of the contract signers must initial that they have read and understand that they will be required to participate in any and all traceback investigations involving the Kinex Telecom voice network.
Wholesale (another company reselling your services)	N/A (we do not provide wholesale services)

Participation in FCCs Enforcement Database	
FRNs associated with 499 Filer ID	0013866488

During Service

Plan for end users to have access to caller ID and blocking systems	
Residential	Residential users do not have access to change originating Caller ID. They have a self-service portal which allows them to block either specific numbers or blocked/unknown callers. Kinex Telecom blocks unallocated DIDs originating from our network.
Enterprise Business	Residential users do not have access to change originating Caller ID. They have a self-service portal which allows them to block either specific numbers or blocked/unknown callers. Kinex Telecom blocks unallocated DIDs originating from our network.
Wholesale (another company reselling your services)	N/A (we do not provide wholesale services)

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Monitoring Plan	
Residential	Kinex Telecom is utilizing monitoring and fraud detection services as a wholesaler through bandwidth.com (DBA Bandwidth.com CLEC, LLC) and VoIP Innovations (DBA VoIP Innovations, Sangoma). Alerts through the two services are provided to Kinex Telecom. In addition to these services Kinex Telecom is analyzes and reports unusual traffic by any subscriber every hour, comparing such things as outbound call volume, short duration call percentage, calls that receive SIP Code 403 percentage, calls that receive SIP Code 607/608 percentage and total percentage of SIP Code 200s. Alerts are sent to fraud@kinextel.net
Enterprise Business	Kinex Telecom is utilizing monitoring and fraud detection services as a wholesaler through bandwidth.com (DBA Bandwidth.com CLEC, LLC) and VoIP Innovations (DBA VoIP Innovations, Sangoma). Alerts through the two services are provided to Kinex Telecom. In addition to these services Kinex Telecom is analyzes and reports unusual traffic by any subscriber every hour, comparing such things as outbound call volume, short duration call percentage, calls that receive SIP Code 403 percentage, calls that receive SIP Code 607/608 percentage and total percentage of SIP Code 200s. Alerts are sent to fraud@kinextel.net
Wholesale (another company reselling your services)	N/A (we do not provide wholesale services)

Plan for Investigating Suspicious Activity	
Residential	After alerts have been generated, Kinex Telecom engineers shall review CDRs and SIP logs to ascertain the source, times and any other pertinent information in regard to suspicious calling activity made across the Kinex Telecom network. Logs shall be preserved as long as deemed necessary and in accordance with any state or federal law or law enforcement investigations.
Enterprise Business	After alerts have been generated, Kinex Telecom engineers shall review CDRs and SIP logs to ascertain the source, times and any other pertinent information in regard to suspicious calling activity made across the Kinex Telecom network. Logs shall be preserved as long as deemed necessary and in accordance with any state or federal law or law enforcement investigations.
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After Service Has Been Used for Illegal Robocalling

Traceback Investigations	
Own traceback methods	Kinex Telecom will block originating traffic identified as illegal robocalls and may terminate service entirely, in accordance with its Acceptable Use Policy which prohibits use of telephone numbers and SIP signaling and transmission for illegal robocalls and fraudulent purposes. Telephone numbers flagged as being used for illegal robocalls will be reported to the FCC and FTC. Kinex Telecom is currently blocking the origination of all unallocated and unused telephone numbers.
Traceback methods for dealing with law enforcement, the FCC, and/or ITG (Industry Traceback Group)	Kinex Telecom will block originating traffic identified as illegal robocalls and may terminate service entirely, in accordance with its Acceptable Use Policy which prohibits use of telephone numbers and SIP signaling and transmission for illegal robocalls and fraudulent purposes. Telephone numbers flagged as being used for illegal robocalls will be reported to the FCC and FTC. Kinex Telecom is currently blocking the origination of all unallocated and unused telephone numbers.
Single Point of Contact for Tracebacks	Scott Chidester, Systems Engineer Office 434-392-4804 x1200 Cell 434-547-8314 717 E 3 rd Street Farmville VA 23901

Communications with State Attorneys General	
Single Point of Contact	James Garrett Office 434-392-4804 x1000 Cell 434-547-9216 717 E 3 rd Street Farmville VA 23901