



Kerman Telephone Company Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Kerman Telephone Company (Kerman) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Kerman has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Specifically, Kerman follows the [best practices for vetting caller identity](#) described by the NANC Call Authentication Trust Anchor Working Group.

Kerman’s business customers are mostly small businesses that are physically located in our service territory. Prior to a new business customer ever making a call on Kerman’s network, we personally know, or get to know, the business owners and/or management. This personal touch gives Kerman a clear view of whether the business is a risk for originating illegal robocalls.

Kerman has never received a request for high-volume origination services. However, were Kerman to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to granting access to the service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

“Know-Your-Upstream Provider” Procedures

Currently, the only upstream providers from which Kerman receives traffic are AT&T and Sinch. Kerman’s connections with these providers have been in place for many years, and we know them very well. Before accepting traffic from any new upstream provider, Kerman would exercise due diligence and seek to ensure that the provider is not using Kerman to carry or process a high volume of illegal traffic. Specifically, Kerman would collect information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Kerman uses software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting



identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. Kerman immediately investigates any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

In addition, Kerman uses call analytics systems provided by Clear IP to identify and block illegal robocall traffic that is bound for its customers. ClearIP uses SIP Analytics to perform dynamic fraud analysis before call setup. It automatically learns the call traffic patterns for each individual subscriber/trunk and destination. It can detect and prevent fraud attacks in milliseconds while legitimate calls continue uninterrupted.

Commitment to Respond to Traceback Requests

Kerman commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.