

KVH Industries, Inc.
Robocall Mitigation and Certification

Section 64.6305(d)(1) Certification. KVH herein certifies that all of the calls that it originates on its network are subject to a robocall mitigation program described below that is consistent with 47 C.F.R. § 64.6305(a), that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

Section 64.6305(d)(2)(i) Certification. KVH also herein certifies that it has not implemented the STIR/SHAKEN authentication framework on any portion of its network because KVH lacks control over the network infrastructure necessary to implement STIR/SHAKEN and is therefore exempt from STIR/SHAKEN implementation requirements. As background, KVH is a reseller of voice services provided by third party service providers. Although KVH makes these services available to its customers on a resale basis, KVH does not control the network infrastructure used to provide these services and is therefore exempt from the STIR/SHAKEN implementation requirements. KVH understands, however, that its service providers have implemented STIR/SHAKEN and therefore the benefits of this technology apply to the services that KVH makes available to its end users.

Procedures to Avoid Originating Illegal Robocall Traffic

Section 64.6305(d)(2)(ii) Certification. KVH has taken specific and reasonable steps to avoid originating illegal robocall traffic as part of its robocall mitigation program. As background, KVH acts as a non-facilities-based reseller in providing an interconnected VoIP calling service that is used almost exclusively by a very limited and specialized customer group that consists of owners, operators and users of leisure vessels and yachts, merchant and government vessels and other maritime crafts and offshore platforms. These customers use KVH's service to maintain connectivity for personal, business and logistical purposes. KVH's pricing for its interconnected VoIP services, while competitive with comparable maritime communications services, is not conducive to the high volume calling trends that are characteristic of Robocalls. Therefore, the potential for KVH's customers to be a source of Robocalls is exceedingly low.

All KVH customers are required to contractually commit to the lawful and acceptable use of KVH services, adherence to which is determined by KVH in its sole discretion. KVH also retains the right to suspend or terminate any customer if KVH has a good faith belief that the customer is using the service in violation of federal, state or local laws, rules or regulations. Unacceptable uses of KVH's calling service expressly include disseminating or transmitting duplicative or unsolicited messages; disseminating or transmitting material of any kind or nature that, to a reasonable person, may be abusive, obscene, harmful, hateful, pornographic, defamatory, harassing, libelous, deceptive, fraudulent, invasive of another's privacy, grossly offensive, vulgar, threatening, malicious or racially, ethnically or otherwise objectionable; impersonating any person or entity; furthering criminal activity; or using a VoIP Service for forwarding US toll-free numbers internationally.

KVH conducts due diligence reviews for its new customers, including performing Office of Foreign Asset Control (OFAC) searches and conducting various denied party reviews of all new customers before providing services and also performing random periodic OFAC reviews for existing customers.

KVH receives a monthly report for its customers itemizing the outbound calls that were made using the KVH service the previous month, including information on the location of the terminating number that was dialed. If these reports include indicators of inappropriate calling patterns, such as high volumes of calls by a single customer that result in relatively high abandonment rates, we have the ability to contact the customer in question to inquire about the nature of their originated VoIP

traffic. If a customer does not become compliant with KVH's limitations on permissible uses of the service, KVH has the contractual ability to terminate their use of the KVH network. Given KVH's very unique customer base, described above, KVH does not employ any third-party analytics vendors to assist KVH in reviewing its customer traffic to detect inappropriate calling patterns.

Since KVH owns the telephone numbers that are used by its customers, KVH is the first to be contacted by a regulatory authority in the event of a consumer complaint or regulatory inquiry. When any such inquiry is received by KVH, we send the customer a reactive email that seeks information on how they are using the calling service and the business purposes that are supported. If the customer cooperates and is willing to achieve compliance, we work with them and give them a reasonable period of time to implement corrective measures. If they are unwilling to cooperate and/or don't care about compliance, we terminate the relationship.

As noted above, KVH is a reseller of third party voice services. As required by Section 64.1200(o), the voice service provider used by KVH maintains a do-not-originate list that screens and blocks the following telephone numbers in the North American Numbering Plan ("NANP"):

- Numbers reported to the Industry Traceback Group as inbound only,
- NANP numbers that are not valid,
- NANP numbers that are not allocated by NANPA,

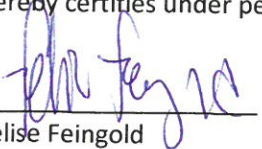
The above list can be supplemented with numbers that have been assigned to KVH customers, but the customers have requested that the numbers be blocked for use for outbound calls. KVH maintains a help desk that is always available to assist KVH's customers regarding the rules and regulations that are relevant to the use of KVH's VoIP calling service. KVH also performs annual training for all KVH employees on KVH's obligations to comply with FCC regulations and the laws and regulations of other jurisdictions.

KVH does not have any upstream providers and therefore does not have any procedures in place to monitor such providers.

Section 64.6305(d)(2)(iii) Certification. KVH certifies that it commits to respond 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 service to originate calls.

Section 64.6305(d)(2)(iv) Certification. At no time in the prior two years has KVH or any of its affiliates been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Certification. I, Felise Feingold, Senior Vice President and General Counsel of KVH Industries, Inc., hereby certifies under penalty of perjury that the foregoing is true and correct.



Felise Feingold
Senior Vice President and General Counsel
KVH Industries, Inc.

Date: 2/26/26