

# Robocall Mitigation Plan

July 2021

Kinetic VoIP Incorporated hereby submits this Robocall Mitigation Plan pursuant to the requirements set forth in 47 C.F.R. §§ 64.6303-6305.<sup>1</sup>

## **Implementation of STIR/SHAKEN and Compliance with Requirements**

Kinetic VoIP, Incorporated is a voice service provider that has implemented the STIR/ SHAKEN authentication framework as required by law.

## **Commitment to Responding to Traceback Requests**

Kinetic VoIP Incorporated is committed to fully and timely responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will continue to cooperate with such entities in investigating and stopping illegal robocallers that use Kinetic VoIP, Incorporated services to originate calls.

## **Know your customer (KYC)**

The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company's networks. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous

experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

### **Efforts to Prevent Originating Illegal Robocall Traffic as Part of a Robocall Mitigation Program**

As part of its robocall mitigation program, Kinetic VoIP, Incorporated has implemented a variety of measures to prevent illegal robocalls from originating on its network. Together, these measures seek to prevent illegal robocall activity in the first instance and proactively identify and investigate calling patterns indicative of illegal robocall traffic. Specifically:

If Kinetic VoIP, Incorporated learns that its own systems or customers are generating suspicious traffic, Kinetic VoIP, Incorporated takes steps to investigate and mitigate unlawful robocalls. To do this:

Kinetic VoIP, Incorporated actively monitors customers engaged in high-volume origination traffic and analyzes patterns consistent with robocalls, such as intermittent bursts of high activity, suspiciously low call completion rates/ short call times, high number of distinct numbers called, and evidence of systematic calling. Kinetic VoIP, Incorporated investigates suspicious traffic and blocks unlawful outgoing robocalls.

Kinetic VoIP, Incorporated employs monitoring equipment to capture call information in real time, including originating number information.

Kinetic VoIP, Incorporated undertakes substantial effort to know the identity of its customers through various measures. This helps Kinetic VoIP, Incorporated prevent its network from being used to originate illegal robocalls. To do this:

Kinetic VoIP, Incorporated provisions service only to customers in its geographic footprint, and only Kinetic VoIP, Incorporated customers have the right-to-use Kinetic VoIP, Incorporated telephone numbers.

Kinetic VoIP, Incorporated in all cases maintains a direct relationship with customers originating traffic on its network.

Kinetic VoIP, Incorporated prevents call origination from telephone numbers that are not its own. For business customers, Kinetic VoIP, Incorporated collects physical business location, contact person(s), and nature of the company's business. The physical business location is verified during the service installation process.

We have direct customer relationships with all entities that use our network: Kinetic VoIP, Incorporated is a Resp Org. Kinetic VoIP, Incorporated is the service provider on all toll-free numbers we sell. Kinetic VoIP, Incorporated does not sell services to international call originators.

Kinetic VoIP, Incorporated does not sell wholesale services.

Kinetic VoIP, Incorporated uses the customer's service name and number for caller ID and CNAM (Caller Name). Business customers may modify their number for legitimate business needs only according to specific guidelines, and any variations from the guidelines must be approved by Voice Product Management. Only telephone numbers assigned to the customer may be used for outbound Caller ID.

Customers are allowed to originate calls only using a billing ANI (Automatic Number Identification) associated with their account. Even if they change their caller ID number, the actual originating number and jurisdiction are included/sent with the call information.

## **Upstream Providers**

Kinetic VoIP Inc. has two upstream providers from which it receives voice traffic

1. Lumen 1025 Eldorado Blvd, Broomfield, CO 80021 877-253-8352  
[billing@lumen.com](mailto:billing@lumen.com)

2. Inteliquint Onvoy, LLC 9081 PAYSPHERE CIRCLE CHICAGO, IL  
60674-0001 [billing.inquiries@inteliquent.com](mailto:billing.inquiries@inteliquent.com)

Kinetic VoIP, Incorporated's Terms of Service, Acceptable Use Policy and tariffs prevent use of its services for illegal purposes.