



Robocall Mitigation Plan

Windfield Enterprises d/b/a Kellin Communications ("KELLIN") is a provider of Internet and Voice Over Internet Protocol ("VoIP") services in Colorado and is dedicated to stopping illegal calls from originating on our network. KELLIN is a reseller of white-labeled services offered by Atheral, LLC ("Atheral") for which KELLIN does not control the softswitch, number porting or call trunking for the associated calls. Accordingly, KELLIN does not have the facilities necessary to implement STIR/SHAKEN. KELLIN has, however, adopted this robocall mitigation plan to establish procedures intended to limit the potential for the origination, carrying, or processing of unlawful robocalls from its voice services.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. Know Your Customer

KELLIN follows the best practices for vetting caller identity recommended by the North American Numbering Council (NANC) [Call Authentication Trust Anchor Working Group](#). This process includes confirming the identity of KELLIN customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers' businesses.

II. Contractual Terms

KELLIN maintains an Acceptable Use Policy ("AUP") that customers must accept before being permitted to use KELLIN's broadband or voice services. Customers using KELLIN's services agree to abide by the requirements set forth in our AUP and Terms of Service Agreements. Customers are informed KELLIN will block services to a customer suspected or found to be using the services for illegal activities, including Robocalling. Customer's subscription to KELLIN's services will be terminated if it is determined the violations occurred.

III. Traceback Requests

KELLIN commits to respond fully, within 24 hours, to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Atheral, and the Registered Traceback Consortium. KELLIN will cooperate with such entities to investigate and stop any illegal robocallers that use KELLIN's service to originate calls.

IV. Robocall Mitigation

KELLIN's underlying voice provider Atheral has committed to fully complying with the Commission's roboblocking requirements. In addition, KELLIN has taken the following actions to comply with the Robocall Mitigation Caller ID requirement:

KELLIN has the capability to mitigate robocalls using the mitigation methods listed below.

- Blacklists
 - Block calls by calling numbers or call prefixes
 - Block calls by SPIDs that are not customers of KELLIN
 - Block calls originating outside of KELLIN's network or its customers' networks



- Block IP addresses identified as SPAM or robocalls
 - Identify User agents that our customers do not use
- Call CAPTCHA
 - Call Detail Record (CDR) Analysis
 - Generate reports that identify high call volume, short call durations, and excessive calls to and from the same number
- Customer Controls
 - Call volume limits
 - Ability to block calls
 - Limit caller id to assigned telephone number

V. Call Analytics Systems

KELLIN relies upon our wholesale VoIP provider Atheral's call analytics systems to identify unlawful traffic originated by its retail customers.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Atheral uses TransNexus's ClearIP solution to monitor our origination voice traffic in real-time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral 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. Atheral will immediately ask KELLIN to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If KELLIN or Atheral determines that the caller was attempting to originate unlawful robocalls, we either warn them to stop or terminate their service based on our AUP.

Examples of calling patterns monitored:

- Higher than expected cost generated by calls from a customer.
- Targeted pumping of repeated calls to a specific called number within a 15-minute period.
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period.
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period.
- Theft of service traffic pumping of repeated calls to a high-cost geographic location within a 60-minute period.
- Recent call volumes (last 60 min) vs weekly trends.
- Number of unique destination numbers in a 60-minute time frame.
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution.
- Anomalies in Answer-Seizure Ratio (ASR).
- Robocalling triggers monitoring for a high volume of outbound calls or excessive incoming calls from the same calling number.
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration.
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends.



VI. Know Your Upstream Provider

KELLIN has an agreement in place with Atheral to resell their VoIP service offering to KELLIN's customers. KELLIN confirms that Atheral is listed in the FCC's Robocall Mitigation Database. KELLIN will not accept traffic from any carrier that is removed from the Robocall Mitigation Database.

VII. Plan Updates

KELLIN will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.