

KeyCom Robocall Mitigation Plan and Compliance with TRACED Act

KeyCom Telephone Systems Inc. (“KeyCom”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the Industry Traceback Group (“ITG”) in investigating and seeking to stop illegal robocalls. While KeyCom necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by its wholesale service providers, PayG LLC dba SkySwitch (SkySwitch) and Coredial LLC. (Coredial). KeyCom has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by its wholesale providers or other downstream providers.

SkySwitch and Coredial have filed their own RMD registrations in which they both report they has fully implemented STIR/SHAKEN.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

KeyCom commits to fully responding within 24 hours to all traceback requests from the ITG, the FCC, and law enforcement and other government agencies. KeyCom will cooperate with these groups to investigate and attempt to stop any illegal robocallers from using Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, KeyCom will work with SkySwitch and Coredial to block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless its investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If KeyCom determines that the identified traffic is not illegal, KeyCom will provide the Enforcement Bureau with an explanation as to why it reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

Use of Call Analytics to Identify and Block Unlawful Traffic

KeyCom relies on its wholesale providers’ use of call analytics systems to identify and block unlawful robocall traffic as set forth in its robocall mitigation plans on file with the FCC.

SkySwitch and Coredial report that their call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusual large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a single ring, and calling numbers that are invalid, unallocated, or on the Industry Traceback Group’s Do Not Originate (“DNO”) list.

Know-Your-Customer Policies

Subscriber Vetting: KeyCom vets the identity of new customers when approving an application and entering into an agreement to provide telephone service. As part of this vetting process, 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. Service will not be provided if a new customer's identification cannot be verified.

Contractual Terms: KeyCom's terms of service prohibit the use of its telephone service for fraudulent or unlawful acts or purposes and prohibit customers from falsifying calling party identification information. KeyCom may terminate a customer's service for violations of its terms.

KeyCom has two upstream providers from which they receive voice traffic:

1. PayG LLC dba Skyswitch
Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.com
2. CoreDial LLC
Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 215.297.4400
Email: cdsupport@skyswitch.com

SkySwitch and Coredial are well-known, reputable wholesale service providers that are registered in the FCC's Robocall Mitigation Database. KeyCom does not itself have knowledge or insight into the upstream providers from which SkySwitch and Coredial receive traffic, but understands from SkySwitch's and Coredial's mitigation plans that their direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.