



Robocall Mitigation Program

As part of KCI Systems, Inc. DBA SystemsNet's submission to the Robocall Mitigation Database, this document describes the specific reasonable steps SystemsNet has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program. It also describes SystemsNet's commitment to respond fully and in a timely manner to all trace back requests from the Commission, law enforcement, and the industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

I. Efforts to Avoid Originating Illegal Robocalls

Through reports, pattern trends, and third-party notifications and complaints, SystemsNet is able to identify potential unlawful robocalling. When SystemsNet suspects it has identified unlawful calling, it may contact the party sending the calls and request that they work to investigate the situation (e.g., to identify the party sending the calls, determine whether the calls are un-lawful, and then to eliminate the source of the calling). When SystemsNet believes it has identified fraudulent activity, it reserves the right to take any action it deems necessary to eliminate the fraudulent activity.

II. Customer On-boarding

SystemsNet has established and implemented comprehensive on-boarding procedures for any new customers. The objective of the procedures is to prevent SystemsNet from being used, intentionally or unintentionally, for spoofed or illegal traffic. These procedures enable SystemsNet to know and understand its customers and their use policy better, which in turn helps us manage unacceptable traffic.

III. Commitment to Responding to Trace Back Requests

SystemsNet is committed to responding fully and in a timely manner to all trace back requests from the Commission, law enforcement, and the industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.