



Robocall Mitigation Plan 2024

Company Overview

Turkana, LLC is a voice services provider offering IP-based voice services. We provide VoIP and SMS/MMS services to business customers.

- We currently have under 10,000 clients utilizing our platform and services.
- We own our own platform for VoIP and SMS/MMS.
- We contract with upstream providers for inbound numbers for SMS/MMS and VoIP.
- We provide service to business class customers only.
- Our Terms and Conditions explicitly prohibit robocalling through our system and may result in immediate termination.

STIR/SHAKEN Implementation Status

Our network implements STIR/SHAKEN call authentication for all IP-originated voice traffic. We maintain current certification from the STI-PA and actively participate in the governance system.

Traffic Monitoring and Analytics

Real-Time Traffic Analysis

- Continuous monitoring of call patterns using automated systems
- Detection of suspicious traffic patterns including high call volumes, short duration calls, and invalid calling numbers
- Regular analysis of call completion ratios and customer complaint data

Know Your Customer (KYC) Procedures

- Comprehensive verification of customer identity before service activation
- Regular review and updates of customer information
- Documentation retention of all customer verification records
- Implementation of risk-based customer screening procedures

Mitigation Measures

Technical Controls

- Call authentication using STIR/SHAKEN for all IP traffic
- Dynamic traffic throttling for suspicious patterns
- Blocking of calls with invalid calling numbers
- Implementation of analytics-based filtering systems

Operational Controls

- 24/7 network operations center monitoring
- Established procedures for rapid response to suspicious activity

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Questions: billing@brck.com



- Regular staff training on robocall detection and mitigation
- Documented processes for investigating and addressing customer complaints

Contract Provisions

- Explicit prohibitions against illegal robocalling in service agreements
- Clear consequences for violation of acceptable use policies
- Requirements for customers to implement appropriate controls
- Right to terminate service for repeated violations

Traceback Cooperation

- Designated point of contact for traceback requests
- Standard operating procedures for responding to traceback requests within 24 hours
- Maintenance of call records sufficient to support traceback efforts

Complaint Management

- Dedicated system for tracking and investigating robocall complaints
- Process for rapid investigation of reported incidents
- Regular review of complaint patterns to identify trends
- Documentation of all investigations and outcomes

Compliance Monitoring and Updates

Internal Compliance Program

- Regular audits of mitigation measures effectiveness
- Quarterly review of compliance with FCC requirements
- Documentation of all mitigation activities
- Regular updates to procedures based on emerging threats

Industry Collaboration

- Active participation in industry working groups
- Regular review of best practices and emerging threats
- Sharing of threat intelligence with trusted partners
- Engagement with law enforcement when necessary

Point of Contact

Robocall Mitigation Program Manager:

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Plan Maintenance

This plan is reviewed and updated quarterly or more frequently as needed. All updates are documented and maintained for a minimum of three years.

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