

Illegal Robocall Mitigation Plan

STIR/Shaken Extensions

KONNECTTEL LLC is a small voice service provider, serving fewer than 100,000 voice service subscriber lines and therefore qualifies for an extension until June 30, 2023 of STIR SHAKEN Implementation under 47 C.F.R. §64.6304(a), which reads:

§64.6304 Extension of implementation deadline.

- (a) Small voice service providers. (1) Small voice service providers are exempt from the requirements of §64.6301 through June 30, 2023.
(2) For purposes of this paragraph (a), "small voice service provider" means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all the provider's affiliates).

KYC Process

KONNECTTEL LLC has established and implemented comprehensive **Know Your Customer** ("KYC") policies for any new and existing customers. The objective of the KYC policy is to prevent from being an intermediate gateway, intentionally or unintentionally, for spoofed or illegal traffic.

KYC procedures enable **KONNECTTEL LLC** to know and understand its customers and their use policy better, which in turn helps **KONNECTTEL LLC** manage unacceptable traffic.

Robocall Mitigation Plan

KONNECTTEL LLC has implemented an Illegal Robocall Mitigation plan where we have enabled the call analysis to filter the voice traffic which originates from our network. We have also implemented dialing rules directly on switch to block such fraudulent calls proactively.

The procedures include, but are not limited to:

1. Invalid Calling Number Blocking on Switch: our switch will automatically block any call that originate from invalid phone numbers (short codes or alphanumeric)
2. Passing the calls only with known numbers which are purchased and assigned to our Customers by **KONNECTTEL LLC**
3. Limiting the channels (simultaneous calls) and new call requests per second for our customers according to the provisioned quota to prevent unwanted traffic to hit our network
4. Limiting the dialing hours based on the Customer's need to mitigate the suspicious traffic generated off-hours in case of any malfunction, human error or security breach.
5. Scheduled caller ID reputation check to filter calls originated from flagged numbers.
6. Periodical reports for Caller ID usage on per-customer basis.
7. Real-time traffic monitoring and statistics presented to NOC team for manual supervision.

KONNECTTEL LLC is constantly improving its Voice network and internal procedures. The company will work on adding new procedures to the existing Illegal Robocall Mitigation Plan according to the future market trends. Should the company determine that changes are appropriate, its practices may differ from those described above.

When **KONNECTTEL LLC** believes it has identified fraudulent activity, it reserves the right to take any action it deems necessary to eliminate the fraudulent activity including terminating the contract and immediate Customer account deactivation.

Traceback

KONNECTTEL LLC responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium, as well as cooperates with such entities in investigating and stopping any illegal Robocallers that use our voice service to originate offending calls.