

Klearcom Tech Limited Robocall Mitigation Plan (RMP)

Know Your Customer

Klearcom Tech Limited at all times ensures the delivery of CLI and call presentation in alignment with the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC367133A1.pdf>)

Traceback

Klearcom Tech Limited 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 Klearcom Voice service to originate calls.

STIR/SHAKEN Extensions

Klearcom Tech Limited is eligible for, and is taking the STIR/SHAKEN implementation extension, received under 47 CFR § 64.6304 because Klearcom have fewer than 100 voice subscriber lines. All voice traffic that originates on the Klearcom network is subject to the Robocall mitigation program described below.

Robocall Mitigation Program

Klearcom Tech Limited uses software to monitor its outbound voice traffic in real-time to detect and alert Klearcom Support teams to the origination of illegal Robocalls. The software provides detailed reporting, identifying suspected illegal Robocalls, and alerts if Klearcom originates any calls in which the calling number is invalid, unallocated, appears in a "DoNot Originate" list in the FCC consumer complaint database, OR has a poor reputation score. Klearcom Tech Limited has implemented internal processes to immediately investigate, within reasonable timeframes, any identified calls to determine if the caller was attempting to originate unlawful/illegal Robocalls that would fall within FCC guidelines. If Klearcom determines that the caller was attempting to originate unlawful/illegal Robocalls, Klearcom will take action by means of written/electronic/verbal warning to stop the offending practice and/or, under FCC guidelines for Robocall Mitigation under the TRACED Act, may terminate the service as deemed appropriate.