



ROBOCALL MITIGATION PLAN (RMP)

Date	On behalf of	Change Summary control
Sep 18, 2023	Kiwanoplus sas	Revised 18/09/2023

Objective

Within this document, Kiwanoplus Telecom outlines the protocols, safeguards, and measures it has implemented to uphold its dedication to monitoring outbound calls and preventing unauthorized or abusive calls from either originating or traversing its network. These measures are in accordance with the directives established by the FCC to deter and address robocalls.

¿How We Prohibited traffic fraudulent and abusive practices?

1. Viability Steps or Protocols to Commence Traffic with Kiwanoplus:

1. **Verified sender request Outgoing call** campaign identification form verified sender request, along with the average dialing values, ASR ACD response average values necessary to not consider it spam traffic or robocall.
2. **Customer Eligibility:** The customer must be a registered entity in the United States.
3. **Physical Presence:** The customer must have a physical address within the United States.
4. **FCC Filer ID:** A crucial requirement is the possession of an active 499 Filer ID.
5. **Digital Presence:** The customer should maintain an active website and an email address associated with the company's domain name.
6. **Ownership Information:** Comprehensive ownership information, including percentage ownership details and relevant contact information, must be provided.
7. **Trade References:** A minimum of two trade references with complete contact information is necessary.
8. **Banking Requirements:** The customer is expected to have a US-based bank account and must provide references from the bank.
9. **Payment Channel:** All payments made by the carrier should be remitted from a US bank account.
10. **Stir & Shaken Compliance:** The customer must adhere to the Stir & Shaken compliance standards, ensuring the integrity and security of voice communications.

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These protocols are essential to establish a successful and compliant relationship with Kiwanoplus.

2. Service Contract Prohibition Specifications

Within Kiwanolus' service contract, several prohibition clauses and sanctions are outlined in the event of client violations. Among the points specified in the service contract are:

1. **Traffic Masking:** This involves the false, modified, or fraudulent identification of Telephone Calls with different origination numbers. If traffic is initiated without the corresponding DID (Direct Inward Dialing) authorization, our monitoring system will detect if masking is employed.
2. **Call Traffic Redirection:** Redirecting calls or communication traffic in a manner that bypasses the agreed-upon routes and rates between telecommunications companies is frequently regarded as an unauthorized or fraudulent practice.
3. **Compliance with Regulations:** Any actions contravening the terms and conditions stipulated in authorized records and applicable FCC/FTC/States regulations for the contracted service.
4. **Prohibited Use:** The use of services for illegal purposes that either implies or results in the commission of a crime or any administrative offense.

3. Active Traffic Monitoring

Kiwanoplus Telecom's Network Operations Center (NOC) continuously monitors all network traffic to ensure service and quality for our customers. This monitoring operates 24/7. We have real-time auditing and syslog capabilities to detect unauthorized ACD (Average Call Duration) and ASR (Answer Seizure Ratio) averages.

4. How We Protect It?

At Kiwanoplus, we execute a range of crucial processes to safeguard against and mitigate fraudulent calls or violations of established laws. These key processes include:

- **Traffic Analysis with KP Monitor:** Part of the technical team's responsibilities involves the comprehensive analysis of all customer traffic flowing through our network. This analysis aims to identify potential

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suspicious or malicious traffic patterns, such as short call durations and unauthorized call bursts. We utilize sensors to detect ACD (Average Call Duration) and Call Attempts Per Second (CAPS). Additionally, we compute Q850 states concerning unallocated, invalid, and call rejections. Instantly, an alert is generated to notify the customer of potential infractions related to suspected illegal calls.

- **Suspicious Traffic Review:** Kiwanoplus adheres to internal processes for reviewing suspicious traffic. Any such traffic is promptly escalated to our pre-sales and customer retention engineering teams, who engage the customer during the analysis process.
- **Blocking Suspect Traffic:** If our monitoring system detects suspect traffic, it is temporarily blocked to prevent it from reaching our vendors. Simultaneously, our team initiates a trouble ticket with the source customer. Based on the analysis, authorization for reactivation is determined.
- **Enforcement Measures:** In cases where the source customer persists in their fraudulent or abusive behavior, they may face indefinite blocking, and sanctions stipulated in the agreed-upon terms will be enforced.

Our distinct advantage lies in our automated monitoring system, which provides us with alerts and detailed reporting tools. This system allows us to detect inbound illegal robocalls and abusive calls originating from bad actors attempting to use our network. Consequently, we are able to protect our vendors, prevent our customers from falling victim to illegal robocalls, and actively conduct thorough analyses and take appropriate actions.

Kiwanoplus Pledge to FCC Regulatory Compliance

Kiwanoplus is unwavering in its commitment to full compliance with federal and state regulatory laws and regulations. We are resolute in our dedication to establishing and executing the requisite procedures and initiatives to play our part in the continuous campaign against the proliferation of illegal robocalls and the mitigation of high-speed traffic.

A handwritten signature in black ink is located in the bottom left area. The signature is stylized and appears to be "D. S. Miller". It is written over a green geometric background that includes a paperclip icon.

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Omar Galaviz, CEO

Septiembre 2023



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