

Enhanced Robocall Mitigation Program Description for KD Systems, Inc.

Company Overview:

KD Systems, Inc. is a telecommunications provider specializing in phone systems for small and medium-sized businesses. We utilize Skyetel as our wholesale carrier to deliver high-quality VoIP services to our customers. Our commitment to combating illegal robocalls is demonstrated through our comprehensive robocall mitigation program, in compliance with the requirements of 47 CFR § 64.6305(d)(ii)-(iii).

Robocall Mitigation Program Components:

1. Strict Authentication Details:

- Multi-factor authentication (MFA) for system administrators and end-users.
- Regular updates and reviews of authentication protocols.

2. IP Address Access Control:

- Restricting access to pre-approved IP addresses only.
- Continuous monitoring and updating of IP address lists.

3. Consecutive Call Limits:

- Enforcing limits on consecutive calls to prevent abuse.
- Monitoring call patterns and automatic limiting of excessive calls.

4. Anomaly Monitoring:

- **Phone System Side:** Advanced anomaly detection for unusual call patterns.
- **VoIP Trunk Side:** Sophisticated monitoring tools for traffic irregularities.

5. Skyetel Integration:

- Leveraging Skyetel's built-in robocall mitigation features for enhanced security.

6. STIR/SHAKEN Implementation:

- Full implementation of STIR/SHAKEN protocols to ensure call authenticity and prevent spoofing.

7. Call Blocking and Labeling:

- Blocking known robocall sources and labeling potential robocalls.
- Using real-time databases and AI to identify and block robocalls.

8. Customer Education and Support:

- Providing resources and support to help customers recognize and report robocalls.
- Regular updates and communications on best practices and mitigation efforts.

9. Traceback Requests:

- Commitment to cooperating with the FCC, law enforcement, and the Industry Traceback Group (ITG).
- Dedicating resources to respond to traceback requests within 24 hours.
- Including traceback cooperation clauses in carrier interconnection and service agreements.

10. Customer Vetting Practices:

- Best practices in vetting the identity of all voice service subscribers.
- Collecting information such as physical customer location, contact details, state or country of incorporation, federal tax ID, and the nature of the customer's business.
- Additional reviews for higher-risk customers, including background checks and possible site visits.
- Utilizing service agreements and acceptable use policies to prevent illegal robocall usage.

11. Telephone Number Validation Practices:

- Confirming the customer or end-user right to use a telephone number.
- Screening originating calls to ensure they match assigned numbers.

12. International Call Originators:

- If services are provided to international call originators, implementing best practices for vetting and validating such customers.

13. Know Your Upstream Provider Procedures:

- Maintaining awareness of upstream providers and their commitment to preventing illegal robocalls.
- Using robocall prevention language in contracts with upstream providers.

14. Ongoing Robocall Mitigation Practices:

- Recurring examination of call detail records (CDRs) to detect suspicious activity.
- Early identification and investigation of potential robocalling situations.

15. Third-Party Analytics:

- Utilizing third-party call analytics to assist in preventing illegal robocalls.
- Employing methods such as Telecom Fraud Prevention, Robocall and Telephone Denial of Service (TDos) Prevention, SIP Analytics, blacklisting and whitelisting, CAPTCHA gateway services, and reputation look-up services.

Conclusion:

KD Systems, Inc. takes the threat of illegal robocalls seriously. Our comprehensive mitigation program, in partnership with Skyetel, employs advanced security measures, strict access controls, continuous monitoring, customer education, and third-party analytics to protect our customers and the integrity of our VoIP services. We are dedicated to providing a secure and reliable communication experience for all our clients.