

This document describes Kenichi's robocall mitigation program as it relates to those obligations set out in the Sixth Report and Order and Further Notice of Proposed Rulemaking issue by the Federal Communications Commission (FCC).

Voice Service Provider Classification

Kenichi does not provide any network infrastructure associated with its applications and instead relies on a CLEC partner to act as the Voice Service Carrier. Kenichi's CLEC partner initiates, carries, and terminates all voice traffic on Kenichi, INC.'s applications.

For these reasons, Kenichi itself does not have an obligation to implement STIR/SHAKEN as of present and relies upon its CLEC partner to leverage STIR/SHAKEN protocols to authenticate Voice traffic on Kenichi's applications.

To Kenichi's knowledge, our CLEC partners have completed STIR/SHAKEN integration and have reported relevant information in the Robocall Mitigation Database.

Robocall Mitigation Plan

Kenichi's applications, by design, do not lend themselves to robocalling implementations. Kenichi has not exposed any APIs or SDK which can be leveraged for a robocalling solution.

All calls need to be initiated by the app running on an Android or iOS device. Furthermore, account owners cannot hold more than one active call at a time.

We take affirmative, effective measures to prevent new and returning customers from originating illegal calls. These measures include investigating all suspicious activities related to Voice traffic on our applications.

We have implemented a call analytics system which monitors inbound/outbound call ratios and which can identify suspicious calling patterns including but not limited to sequential dialing, outgoing calls with high intensity within a specific time slot, .

User accounts exhibiting suspicious calling patterns are immediately flagged and automatic action can be taken to deactivate the account and thereby prevent their ability to make or receive Voice calls on the

relevant our application.

Kenichi proactively applies anti-fraud measures in addition to the anti-fraud measures, performed by our U.S.-based CLEC partner.

We will deactivate accounts if any fraudulent or abusive activities are reported. Upon account deactivation, the user will no longer be able to make use of our services provisioned to the account.

We can blacklist callee numbers which have elected to no longer receive calls from phone numbers held by users of our products. And we also provide mobile users with the ability to easily block calls from our mobile applications.

Traceback Participation

Kenichi will participate fully and quickly in all legal requests for voice call tracebacks needed to combat robocalling, pursuant to the TRACED Act, and other applicable laws and regulations. Kenichi certifies that it has not been prohibited from filing in the Robocall Mitigation Database at any time.

Kenichi does not provide any network infrastructure associated with its applications and instead relies on a CLEC partner to act as the Voice Service Carrier. XuFan's CLEC partner initiates, carries, and terminates all voice traffic on XuFan's applications.

For these reasons, XuFan itself does not have an obligation to implement STIR/SHAKEN as of present and relies upon its CLEC partner to leverage STIR/SHAKEN protocols to authenticate Voice traffic on XuFan's applications.