

KALLZER TECH LLC – Robocall Mitigation Program (RMP)

1. STIR/SHAKEN Implementation

KALLZER TECH LLC has deployed the STIR/SHAKEN Caller ID Authentication Framework on all portions of its network capable of supporting SIP-based, end-to-end IP call origination and termination.

KALLZER TECH LLC uses **TNSI–Metaswitch STIR/SHAKEN implementation** for signing calls traversing IP interconnections with **TNS/Inteliquent**, our primary upstream long-distance provider. All calls originating from IP-enabled customer endpoints and moving through these interconnections receive **full SHAKEN authentication**, consistent with **47 CFR § 64.6301(a)(1)–(2)**.

1.1 Partial Deployment

KALLZER TECH LLC remains subject to the extension under **47 CFR § 64.6304(d)** for network segments that rely on non-IP, TDM-based interconnections commonly found in rural markets. These upstream carriers have not yet upgraded their infrastructure to support native IP or out-of-band SHAKEN transmission.

KALLZER TECH LLC continues to monitor the development of out-of-band SHAKEN frameworks and will integrate them as industry support becomes available.

1.2 Attestation Assignment Policy

KALLZER TECH LLC assigns attestation levels based on verified customer identity, number ownership, and traffic risk classification:

- **A-Attestation** – customer identity verified, number ownership validated, and traffic originates from known and authenticated endpoints.
- **B-Attestation** – identity verified, number ownership partially verified, or higher-risk campaigns (e.g., high-volume call centers).
- **C-Attestation** – traffic received from upstream providers where the origin cannot be fully validated.

This attestation policy applies **only to segments of our network where STIR/SHAKEN is technically supported** and is fully documented in this revised RMP.

2. Know Your Upstream Provider (KYUP)

2.1 Upstream Provider Verification Requirements

KALLZER TECH LLC performs due diligence vetting of all upstream carriers, including:

A. FCC Registration Number (FRN) Verification

Each upstream provider must have:

- A valid **FCC Registration Number (FRN)**
- Proper FCC regulatory standing

B. Robocall Mitigation Database (RMD) Verification

Prior to exchanging traffic, KALLZER TECH LLC verifies:

- Upstream provider's active registration in the **FCC Robocall Mitigation Database**
- Their RMD filing status (STIR/SHAKEN compliance or mitigation plan status)
- Confirmation that they have **not been removed or prohibited** by the FCC Order

C. STIR/SHAKEN Validation

We confirm whether the upstream partner:

- Signs traffic with valid SHAKEN certificates
- Uses a secure certificate authority under the STI-GA
- Has no history of invalid/forged identity headers

D. Traceback Cooperation History

KALLZER TECH LLC evaluates upstream partners based on:

- Responsiveness to USTelecom Traceback Group
- Past enforcement actions
- Reliability of abuse reporting channels

3. Know Your Customer (KYC)

KALLZER TECH LLC follows industry-standard KYC procedures, including:

- Government-issued ID (individuals)
- Corporate registration (businesses)
- Tax ID/EIN verification
- Address verification

- Contact verification (email, phone, domain validation)
 - Validation of calling use-case, target geographies, CPS, and ACD expectations
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4. Robocall Monitoring Program

Using **TNS Call Guardian Analytics** and the **Metaswitch Call Guardian Authentication Hub (CGAH)**, KALLZER TECH LLC continuously monitors:

- Invalid/unassigned number attempts
- High-risk call patterns
- Negative reputation score traffic
- DNO list hits
- ACD spikes below 12–15 seconds
- Call bursts & abnormal CPS
- Any traceback notice

As per the original plan:

- Calls from invalid numbers
 - Calls from “Do-Not-Originate” lists
 - Calls flagged with TNS scores -3 or -4 are automatically blocked.
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5. Enforcement Workflow – 3-Strike Traceback Policy

Strike 1 – Warning

- Customer notified immediately
- Required to submit an explanation
- Campaign paused if necessary

Strike 2 – Final Warning

- CPS throttling or temporary suspension
- Mandatory compliance action plan
- Reclassification to High-Risk tier

Strike 3 – Termination

- Full account termination

- Numbers blacklisted
- Upstream partners notified

This directly aligns with FCC enforcement expectations in 2024–2025.

6. Block-Upon-Notice SOP

Upon receiving notice from the FCC, USTelecom Traceback Group, law enforcement, or upstream providers:

1. Immediate suspension of traffic
 2. The investigation started within 2 hours
 3. SIP logs, CDRs, and identity headers preserved (minimum 24 months)
 4. Root-cause analysis performed
 5. Enforcement action applied according to risk category
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7. Traceback Response SLA – 24 Hours

KALLZER TECH LLC responds to all traceback requests within 24 hours.

8. 24/7 Traceback & Abuse POC

KALLZER TECH LLC maintains a 24/7 abuse response channel.

Email: abuse@kallzertech.com

Phone: +1-605-215-5669

Availability: 24/7/365

9. Compliance & Ongoing Monitoring

KALLZER TECH LLC regularly audits:

- KYC/KYUP processes
- STIR/SHAKEN coverage
- Traffic analytics
- FCC regulation changes

The company maintains **full eligibility to file** in the RMDB.