

Robocall Mitigation Program Description

Company Name: KELFRONTENDEV LLC

FCC Registration Number (FRN): 0037269230

FCC 499 Filer ID: Pending

KELFRONTENDEV LLC has implemented a robust Robocall Mitigation Program in accordance with 47 CFR § 64.6305. The program is designed to prevent the origination and transmission of illegal robocalls and comply with all relevant regulations.

1. Mitigation Strategy

All calls originated by our network are subject to active monitoring and analysis. We use tools and internal analytics to detect and filter suspicious traffic patterns. Calls failing to meet compliance thresholds are flagged and investigated immediately.

2. Traceback Response

KELFRONTENDEV LLC commits to responding to traceback requests from the FCC, law enforcement, and the Industry Traceback Group within 24 hours. We cooperate fully with traceback investigations to prevent the use of our network for illegal activities.

3. STIR/SHAKEN Status

We currently have not implemented the STIR/SHAKEN authentication framework (Option 3). However, all traffic is subject to mitigation procedures and monitored regularly.

4. Compliance Monitoring

We have internal policies in place for customer vetting, ongoing traffic analysis, and proactive fraud detection. We continuously monitor ASR and ACD to ensure traffic quality and compliance.

5. Customer Screening

All customers are required to complete KYC (Know Your Customer) checks including company incorporation verification, FCC registration, and robocall risk assessment.

6. Exemption Justification

As a non-facilities-based VoIP provider operating with partial infrastructure, we are not technically capable of fully implementing STIR/SHAKEN at this time. We operate under the exemption as outlined in 47 CFR § 64.6304.

7. Confidentiality Request

This document contains sensitive information related to our network and fraud prevention strategies. A request has been filed in ECFS for confidential treatment of this document.

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