

Kee AI Inc. — Robocall Mitigation Program Description

(47 C.F.R. § 64.6305(d)(2)(ii)–(iii) filing — Option 3, Non-Obligated Voice Service Provider)

1 Company Identification

- **Legal name:** Kee AI Inc. (British Columbia corporation)
- **FRN:** 0037249612
- **Head office:** 303-700 West Pender Street Vancouver, BC V6C1G8
- **Compliance contact:** admin@thekee.ai +12362335332

2 Scope of Service & Exemption Basis

Kee AI leases NANP numbers from Sangoma and re-assigns them solely for **SMS/A2P and over-the-top (WhatsApp/Meta) messaging**. **Voice capability is disabled** at carrier and application layers, so Kee AI **does not originate, carry, or terminate PSTN/SIP voice calls**.

Accordingly, under **47 C.F.R. § 64.6301(a)** (caller-ID authentication applies only to SIP voice calls), Kee AI is **exempt from STIR/SHAKEN** implementation requirements.

3 Reasonable Steps to Prevent Illegal Robocall Traffic

Control	Description
Know-Your-Customer (KYC) — 47 C.F.R. § 64.1200(n)(4)	All customers must pass ID and corporate-registry checks before activation; records retained two years.
Know-Your-Upstream-Provider	Kee AI sources numbers exclusively from Sangoma Technologies Corp. , reviews Sangoma's RMD certification each January, and keeps an annual STIR/SHAKEN compliance attestation on file.
Acceptable-Use & Consent Policy	Terms prohibit unsolicited calls/messages, TCPA/CASL violations, spoofing, and sending of illegal content; violations trigger immediate suspension.
Traffic Analytics	Messaging traffic is monitored via in-house log-analysis scripts (rate, destination mix, error codes); no third-party analytics vendor is used at this time.
A2P 10DLC & Carrier Vetting	Every U.S. brand and campaign is registered with The Campaign Registry; unregistered traffic is blocked.

Complaint & Traceback Handling Dedicated mailbox and phone respond **within 24 hours** to requests from the FCC, law enforcement, or the Industry Traceback Consortium; logs preserved 24 months.

4 Commitment to 24-Hour Traceback Response

Kee AI commits to respond fully within 24 hours to all traceback requests and to co-operate in identifying and terminating any illegal robocallers that attempt to use its service.

5 Prior Enforcement Actions

Kee AI Inc. has **no** past or pending FCC, CRTC, or other regulatory actions related to robocalls, spoofing, or mitigation-plan deficiencies.

6 Officer Certification

I certify, under penalty of perjury, that the statements above are true and correct and that Kee AI Inc. will update this program within ten (10) days of any material change, as required by 47 C.F.R. § 64.6305(d).

Ehsan Mozaffaripour, CEO
Date: July 21, 2025