

Kai Data, LLC Robocall Mitigation Plan Introduction

In addition to our other compliance related policies and procedures, Kai Data, LLC (Kai Data) is committed to implementing robust measures to prevent the origination of illegal robocalls, collaborating with industry partners, and educating our customers on compliance and best practices. Kai Data's program follows the Commission's requirements as outlined in its December 30, 2020 Fourth Report and Order in CG Docket No. 17-59 and subsequent Orders¹, which require every voice service provider to: (i) respond within 24 hours of receipt to traceback requests from the Commission, civil and criminal law enforcement, and the Commission's official designated Traceback Consortium (currently the USTelecom Industry Traceback Group); (ii) take steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission; and (iii) implement affirmative, effective measures to prevent new and renewing clients from using our network to originate illegal calls.

Technology Implementation

Kai Data utilizes a dialer system that is not classified as an autodialer. It cannot store or produce telephone numbers using a random or sequential number generator, and it requires human intervention for each call. The system is designed to make only one phone call at a time, ensuring compliance with FCC regulations. Additionally, the system does not support sending SMS or leaving pre-recorded voicemail messages.

Kai Data does not control the underlying network infrastructure typically required to implement STIR/SHAKEN in the manner of a traditional telecommunications or VoIP provider. Where Kai Data obtains interconnected VoIP service from a partner, that partner applies applicable STIR/SHAKEN procedures

Know Your Customer

Kai Data subscribers primarily consist of real estate agents, which are required to hold a valid real estate license, a fact that is confirmed during the KYC process. As such each subscriber has passed a rigorous identity, and background check. A subscriber's identity is further verified through an on-line integrated onboarding and verification service ("Identity Check"). The Identity Check requires a valid ID and a clear picture of the subscriber's face to ensure accuracy and includes a background check in compliance with KYC requirements.

¹ May 19, 2023 Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, February 27, 2025, Eighth Report and Order in CG Docket No. 17-59., and Third Notice of inquiry in CG Docket 17-59; March 16, 2023 Sixth Report and Order and Further Notice of Proposed Rulemaking in WC Docket No. 17-97, and as codified at 47 § 64.1200(n)(4) and 47 § 64.6305.

Monitoring and Reporting

Kai Data employs analytics technologies to monitor network traffic and identify potentially unlawful call origination activities. We have established enforceable terms of use and an acceptable use policy to prevent the origination of illegal robocalls. Our anti-fraud policies are updated as necessary to address emerging threats and ensure compliance with industry standards.