

## **Kunz, Leigh and Associates ROBOCALL MITIGATION PLAN**

### **STIR/SHAKEN Continuing Extension**

Kunz, Leigh and Associates (KL&A) is complete STIR SHAKEN.

KL&A has contracted with Bandwidth to provide numbering for assignment to KL&A's customers as well as routing of the traffic and STIR SHAKEN compliance. KL&A and Bandwidth connect via HTTP as an API user. Bandwidth has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Bandwidth has fully implemented STIR/SHAKEN within its network and signs originating calls on behalf of the KL&A customers routing on Bandwidth's network.

### **Robocall Mitigation Plan**

All voice traffic that originates on KL&A's network is subject to the following Robocall Mitigation Plan.

### **Traffic Monitoring and Detection**

Bandwidth provides traffic monitoring and detection (call analytics) for KL&A's traffic which routes via the Bandwidth network. Bandwidth has implemented technical and operational processes and procedures to monitor, detect and analyze traffic on its network. The operational processes and procedures help to determine when illegal and inappropriate robocalling activity may be occurring. Bandwidth has developed and deployed a "Call Blocking Tool" that incorporates industry best practices into its core network to identify and block invalid, unallocated and otherwise obviously illegal telephone numbers. When unlawful robocall campaigns are detected, Bandwidth follows established processes and procedures to notify KL&A of the problematic traffic.

In addition to using Bandwidth's provided monitoring capabilities, KL&A proactively monitors voice call failures. When failure rates are high, KL&A works with their customers to determine the root cause of the failures, including whether there may be illegal or inappropriate robocalling occurring.

### **Investigation**

KL&A investigates calls identified as problematic or possibly part of an unlawful robocall campaign. KL&A will take immediate corrective actions to prevent recurrence of the illegal calls.

### **Enforcement**

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a KL&A customer is using our network to fraudulently spoof calls or to originate illegal robocalls, KL&A will terminate their service.

### **Know your Customer**

KL&A has procedures in place to prevent new & renewing customers from originating illegal robocalls. KL&A customers are all within the public sector. KL&A thoroughly vets new government customers by asking personally identifiable questions for additional security on each account before activating a new service or making changes to existing services.

Government customers establish a formal contract with KL&A through their procurement process. These contracts outline the customer's communications needs, along with background on the agency and program area that will implement the software. KL&A's communications solution and related services are specifically tailored and marketed to the government sector, which creates an expectation that illegal robocalls will be virtually nonexistent within our system. Once a contract is executed, KL&A creates the primary authorized user account for government customers.

### **Upstream Provider Knowledge**

All upstream service providers must maintain valid registrations in the FCC's Robocall Mitigation Database ("RMD") and clear service-specific contractual requirements which includes cooperating with the Industry Traceback Group (ITG) and agreeing to follow all applicable laws against illegal robocalling, fraud and abuse.

### **Traceback**

KL&A commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. KL&A commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

### **Robocall Mitigation Database Eligibility**

KL&A has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

KL&A has not been prohibited from filing in the Robocall Mitigation Database.

### **Role in the Call Chain**

KL&A is a voice service provider with a STIR SHAKEN obligation.