

Robocall Mitigation Plan

Kaddoura Consulting Inc. (dba KCiNetworks)

Date of Filing: February 3, 2026 **Provider Type:** Interconnected VoIP Provider (Reseller)

Upstream Platform Provider: SkySwitch (a BCM One company)

I. Introduction

Kaddoura Consulting Inc., operating under the name **KCiNetworks** (the "Company"), provides advanced VoIP communication services to business clients. The Company operates as a white-label reseller utilizing the infrastructure, switching capabilities, and technical network of **SkySwitch**. This Robocall Mitigation Plan (RMP) outlines the specific steps taken by the Company and its upstream partner to prevent the origination of illegal robocall traffic.

II. STIR/SHAKEN Implementation

KCiNetworks has fully implemented the STIR/SHAKEN caller ID authentication framework across its network via its partnership with SkySwitch.

- **Technical Implementation:** Because the Company utilizes SkySwitch's hosted PBX platform, all calls originating from KCiNetworks subscribers are cryptographically signed by SkySwitch on the Company's behalf.
- **Attestation Levels:** SkySwitch manages the "Know Your Customer" (KYC) data provided by the Company to ensure calls are signed with the highest possible level of attestation (Level A or B), ensuring transparency in the call's origin.

III. Robocall Mitigation & Analytics

The Company places the primary technical onus for call monitoring and mitigation on **SkySwitch**. As the underlying carrier and platform provider, SkySwitch employs real-time, automated analytics to protect the integrity of the network.

- **Real-Time Monitoring:** SkySwitch utilizes sophisticated algorithms to identify suspicious traffic patterns, such as high-volume bursts, abnormally high ratios of short-duration calls, and calls to unallocated numbers.
- **Automated Blocking:** Traffic identified by SkySwitch as highly likely to be fraudulent or illegal is blocked or diverted at the platform level before entering the Public Switched Telephone Network (PSTN).

- **Do-Not-Originate (DNO):** Through SkySwitch, KCiNetworks enforces DNO lists to ensure that calls claiming to originate from sensitive government or non-dialable numbers are strictly prohibited.

IV. Know Your Customer (KYC) Procedures

KCiNetworks maintains responsibility for vetting all subscribers before they are permitted to utilize the SkySwitch-powered network.

- **Subscriber Verification:** The Company conducts due diligence on all new business clients, verifying business registration, physical address, and federal tax identification.
- **Contractual Compliance:** All customers must adhere to a strict Terms of Service policy that prohibits the use of the Company's services for illegal robocalling, spoofing, or deceptive telemarketing.
- **Enforcement:** KCiNetworks maintains the right to immediately suspend or terminate any account flagged by SkySwitch analytics or identified through traceback requests as a source of illegal traffic.

V. Traceback & Law Enforcement Cooperation

KCiNetworks is committed to full and rapid cooperation with the Industry Traceback Group (ITG) and law enforcement agencies.

- **24-Hour Response:** The Company commits to responding to all traceback requests within **24 hours**.
- **Technical Cooperation:** In the event of a traceback request, the Company works in tandem with SkySwitch to identify the originating source of the traffic and will provide all necessary documentation to the requesting authorities.

VI. Certification

I certify that Kaddoura Consulting Inc. (dba KCiNetworks) has taken the reasonable and documented steps described above to mitigate the origination of illegal robocalls and that the information provided is accurate to the best of my knowledge.

Signed: 
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Name: Sam Kaddoura

Title: President / CEO

Company: Kaddoura Consulting Inc. (dba KCiNetworks)

Date: February 3, 2026