

McKibben Technologies

ROBOCALL MITIGATION PLAN

McKibben Technologies is a reseller of Voice over Internet Protocol (VoIP) services. This Robocall Mitigation Plan describes the specific, reasonable steps that **McKibben Technologies** has taken to prevent the origination, carrying, or processing of illegal robocall traffic on the networks used to provide its services.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls

McKibben Technologies maintains a “know-your-customer” (KYC) policy and exercises due diligence to ensure its services are not used to originate illegal robocalls or other unlawful communications.

As part of its onboarding process for business customers, **McKibben Technologies** undertakes commercially reasonable precautions prior to entering into a formal written agreement. All prospective business customers participate in an in-person, virtual, or telephonic enrollment and contracting process.

In addition, **McKibben Technologies** investigates prospective business customers by reviewing available information to confirm the legitimacy of the business. This may include verifying the existence of a company website, determining how long the business has been operating, and confirming corporate registration or good standing through applicable state or governmental records, along with other indicators of a legitimate operating business.

As part of this process, **McKibben Technologies** collects and, as necessary, verifies the following information from prospective business customers:

- Physical business location
- Primary contact person(s)
- State or country of incorporation
- Federal tax identification number
- General nature of the business

If **McKibben Technologies** receives a request for high-volume or unusual call origination services, additional scrutiny is applied, and such services are not provisioned until the customer has been thoroughly reviewed and approved.

Furthermore, **McKibben Technologies** maintains an Acceptable Use Policy that prohibits illegal robocalling and other abusive practices and reserves the right to suspend or terminate services for customers found to be in violation.

Know-Your-Upstream Provider Procedures

McKibben Technologies works only with upstream service providers that maintain their own robocall mitigation programs and regulatory compliance practices. **McKibben Technologies** reasonably relies on its upstream providers to exercise due diligence in monitoring, analyzing, and mitigating illegal robocall traffic entering their networks.

Use of Call Analytics and Monitoring

McKibben Technologies relies on call analytics, monitoring tools, and reporting mechanisms made available through its service providers and internal review processes to identify suspicious calling patterns or indicators of potential illegal robocalling. When suspicious activity is identified, **McKibben Technologies** takes appropriate action, which may include investigation, customer outreach, traffic restriction, or service termination.

Commitment to Respond to Traceback Requests

McKibben Technologies commits to responding fully and promptly—typically within 24 hours—to all traceback requests from the Federal Communications Commission (FCC), law enforcement agencies, and the industry traceback consortium. **McKibben Technologies** will cooperate in good faith with such entities to investigate and stop illegal robocall activity originating from, transiting through, or otherwise associated with its services.