

Robocall Mitigation Program Plan

Filing Entity: Kiapotec, Inc. (DBA: Kiapo)

FCC Registration Number (FRN): 0037852266 **Operating Company Number (OCN):** 038M

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Document Owner	David H Smith, President
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Scope	Outbound calling and origination on Kiapotec-controlled voice services (including platforms and

1. Purpose

This Robocall Mitigation Program Plan ("Plan") describes the policies, processes, and technical controls used by the filing entity to prevent, detect, and remediate illegal robocall traffic, and to respond to traceback requests consistent with 47 CFR 64.6305(a). This Plan is intended for submission to the FCC Robocall Mitigation Database (RMD) and for internal operational use.

2. Company and Service Profile

2.1 Provider Role

Kiapotec provides voice services and originates calls on behalf of its customers and internal users. Outbound traffic may traverse third-party hosted platforms and upstream carriers/trunk providers. This Plan applies to all originating traffic for which Kiapotec is the filing entity in the RMD.

2.2 Identifiers

Legal Name	Kiapotec, Inc.
DBA Name(s)	Kiapo
FRN	0037852266
OCN / Company Code	038M
Other FRNs	None
Previous Business Names	None

2.3 Upstream Providers and Platforms

Current hosted voice platform / application layer: 2600Hz
Current PSTN interconnect / trunking providers: 2600Hz/OOMA.

Planned changes: Migrate trunk procurement to Ooma and transition to direct signing with Kiapotec-issued STI certificates.

3. STIR/SHAKEN Implementation Status

Select and maintain the section below that matches the RMD certification option selected in the filing. Delete unused options before finalizing the PDF.

- ☒ **Option 1 - Complete STIR/SHAKEN implementation** (all originating calls on the network are authenticated/signed where technically feasible).
- ☒ **Option 2 - Partial STIR/SHAKEN implementation** (STIR/SHAKEN is implemented on a portion of the network, and all calls originated on that portion are authenticated/signed).
- ☐ **Option 3 - No STIR/SHAKEN implementation** (STIR/SHAKEN is not implemented on any portion of the network).

Current Implementation

Kiapotec currently enables STIR/SHAKEN authentication for originating traffic via its hosted voice platform and/or upstream providers (for example, signing performed by a platform partner such as 2600Hz). Kiapotec is completing STI-PA enrollment to obtain the credentials required to sign calls directly under Kiapotec-issued STI certificates as interconnect/trunking arrangements evolve. Kiapotec will update its RMD certification and this Plan as implementation status changes.

Note: Replace the above paragraph with an accurate statement of the current state (who signs, where, and for which traffic).

4. Robocall Mitigation Program

Kiapotec maintains a robocall mitigation program that includes reasonable steps to prevent and mitigate the origination of illegal robocalls. Controls are applied across onboarding, number management, traffic monitoring, incident response, and vendor oversight.

4.1 Customer / User Onboarding and KYC

- Collect and validate customer identity and contact information prior to enabling outbound calling (name, address, email, phone).
- For business customers/resellers: collect corporate registration details and authorized signatory information.
- Verify customer-provided caller ID numbers are owned/controlled by the customer (e.g., recent bill, LOA, or other verification).
- Maintain a clear acceptable use policy prohibiting illegal robocalls, spoofing, and abusive calling patterns.

4.2 Number Assignment and Caller ID Controls

- Restrict outbound Caller ID to numbers assigned to the customer or verified as authorized for use.
- Block or rewrite invalid calling party information when detected (e.g., missing/invalid ANI, prohibited formats).
- Apply per-tenant and per-number policies for outbound dialing permissions (international, high-cost destinations, etc.).

4.3 Traffic Monitoring and Anomaly Detection

- Monitor originating traffic for abnormal volumes, short-duration calls, high answer-seizure ratios, high post-dial delay anomalies, and repeated calling patterns.
- Set alert thresholds and rate limits at the tenant/account level (e.g., calls-per-minute, concurrent call caps).
- Investigate spikes and patterns indicative of robocalling, neighbor spoofing, or unlawful campaigns.

4.4 Enforcement and Remediation

- Upon detection or credible notice of suspected illegal robocalls, promptly investigate and take corrective actions, which may include: warning, rate-limiting, temporary suspension, permanent termination, and/or number reclamation.
- Preserve relevant call detail records (CDRs), SIP logs, and account information to support traceback and investigation.
- Coordinate with upstream providers/platform partners to block abusive traffic and prevent recurrence.

4.5 Vendor / Partner Oversight

- Maintain contractual relationships and escalation paths with platform partners and upstream carriers (e.g., hosted platform and trunk providers).

- Ensure third parties supporting origination (signing services, carriers) have defined roles for abuse handling and traceback cooperation.
- Review partner performance and update routing to reduce exposure to abusive traffic as needed.

5. Traceback Requests and 24-Hour Response Process

Kiapotec commits to respond fully and within 24 hours to traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate in investigating and stopping illegal robocallers that use its service to originate calls.

5.1 Traceback Intake

- Primary intake email: tax-regulatory@kiapo.net (monitored business hours; forwarded to on-call mailbox).
- Primary intake phone: (503) 558-5151.
- Secondary intake: None.

5.2 Internal Workflow

- Acknowledge receipt within 4 business hours (or sooner) and open an internal incident/ticket.
- Identify the originating customer/account/tenant and the upstream interconnect path using CDRs, SBC logs, and platform records.
- Provide requested call path information to the requester and preserve records.
- If illegal or abusive activity is indicated, initiate enforcement steps per Section 4.4 and document actions taken.

6. Recordkeeping and Review

- Retain call detail records and related logs for at least [X] months (consistent with operational and contractual requirements).
- Review robocall mitigation controls at least annually and after significant changes (new carriers, new platforms, major routing changes).
- Update the RMD filing within 10 business days of any changes to required information (contacts, identifiers, implementation status).

7. Points of Contact (edit)

Role	Name / Title	Email	Phone
Robocall Mitigation Contact	David H Smith	tax-regulatory@kiapo.net	+15035585151x2020
Traceback / Security Escalation		voip-services@kiapo.net	+15035585151x1020
Regulatory / Legal Escalation		tax-regulatory@kiapo.net	

Attestation (internal)

By maintaining this Plan, Kiapotec affirms that it has implemented the controls described herein and will execute them in good faith. This Plan is a living document and will be updated as systems, providers, and regulatory requirements evolve.