

Robocall Mitigation Program Description

1. Overview

Kornerstone Media is committed to preventing the origination of illegal robocalls on its network. We provide voice services to end-users using Twilio as our upstream voice service provider. All outbound calls are originated through Twilio, which is responsible for STIR/SHAKEN attestation and compliance.

2. STIR/SHAKEN Implementation

Kornerstone Media does not have the technical capability to implement STIR/SHAKEN directly, as we do not operate our own voice network. Instead, we rely on Twilio, which has fully implemented the STIR/SHAKEN authentication framework and signs all eligible outbound calls on our behalf. This exemption is in accordance with 47 CFR § 64.6304(d).

3. Robocall Mitigation Practices

In addition to relying on Twilio's STIR/SHAKEN implementation, Kornerstone Media has established the following robocall mitigation practices:

- **Customer Vetting:** We verify the identity and legitimacy of all customers before providing voice services. This includes collecting business information and, where appropriate, conducting additional due diligence.
- **Traffic Monitoring:** We monitor outbound call traffic for patterns indicative of illegal robocalling, such as high call volumes, short call durations, and high answer or complaint rates.
- **Complaint Handling:** We maintain a process for receiving, investigating, and responding to complaints about suspected illegal robocalls originating from our service.
- **Traceback Cooperation:** We commit to fully cooperate with the FCC, law enforcement, and the industry traceback consortium, and to respond to traceback requests within 24 hours.
- **Education and Enforcement:** We educate our customers about legal calling practices and take prompt action, including suspension or termination of service, if we detect or are notified of illegal robocalling activity.

4. Exemption Statement

Kornerstone Media is exempt from direct STIR/SHAKEN implementation under 47 CFR § 64.6304(d) because we rely exclusively on Twilio, our upstream provider, to originate calls and perform STIR/SHAKEN signing.

5. Contact Information

For questions or complaints regarding our robocall mitigation practices, please contact:
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