

KloudDial is a voice service provider serving end-users and has fully implemented the STIR/SHAKEN authentication framework across its entire IP-based network. All calls originated on its network are subject to this robocall mitigation program, which is designed to prevent illegal robocall traffic and to ensure compliance with applicable FCC robocall mitigation requirements.

Role in the Call Chain

KloudDial acts as a **Voice Service Provider with a STIR/SHAKEN implementation obligation serving end-users.**

STIR/SHAKEN Implementation Status

KloudDial certifies to **Complete STIR/SHAKEN Implementation.** The company has fully implemented the STIR/SHAKEN authentication framework across its entire network, and all calls it originates are compliant with applicable FCC STIR/SHAKEN requirements.

Underlying Platform / Service Delivery

KloudDial utilizes underlying third-party voice platform and network resources, including **SkySwitch**, in support of its voice service offerings. KloudDial remains responsible for customer onboarding, traffic monitoring, robocall mitigation procedures, traceback cooperation, and compliance obligations applicable to its role in the call chain.

Reasonable Steps to Mitigate Illegal Robocalls

KloudDial maintains reasonable practices and safeguards to avoid originating illegal robocall traffic. These measures include review of customer accounts, monitoring of traffic patterns, investigation of suspicious calling activity, and corrective action when unlawful, fraudulent, spoofed, or otherwise suspicious traffic is identified. The company reviews calling activity for indicators such as abnormal call volumes, unusual short-duration traffic, invalid or unallocated calling numbers, excessive outbound patterns inconsistent with the customer's stated business use, and other anomalous behavior associated with illegal robocalling.

Customer Vetting Procedures

Before activating service, KloudDial performs risk-based due diligence on prospective customers. This may include verifying business identity, contact information, business purpose, calling use case, and other relevant account information. Depending on the risk profile, the company may request supporting documents or additional information before permitting traffic to originate.

Ongoing Monitoring and Enforcement

KloudDial monitors traffic on an ongoing basis and investigates red flags or complaints that may indicate illegal robocall activity. When appropriate, the company may request additional information, limit traffic, block calls, suspend service, or terminate service associated with suspected illegal robocalls, spoofing, fraud, or failure to cooperate with an investigation.

Traceback Response and Cooperation

KloudDial commits to respond fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the registered industry traceback consortium. The company cooperates

with these entities in investigating and stopping illegal robocallers that use its service. The company maintains procedures to review traceback notices promptly, identify the source of traffic where possible, preserve relevant records, and take appropriate mitigation action.

Recordkeeping and Program Review

KloudDial maintains records related to customer onboarding, traffic review, traceback responses, and mitigation actions, and periodically reviews and updates its robocall mitigation procedures to address evolving robocall risks.

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