

Kalson Networks LLC ROBOCALL MITIGATION PLAN

Kalson Networks LLC is the parent company. Anam Kalson is the Director of Kalson Networks LLC

Kalson Networks LLC provides voice service to fewer than 100,000 voice subscriber lines. Some of the customers are served on the non-IP portions of Kalson Networks LLC's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

As required to meet the non-IP network criteria for the continuing extension and consistent with § 64.6303 (a)(2), Kalson Networks LLC is a member of NTCA and NTCA participates on the ATIS Non- IP taskforce working group which developed the (ATIS solutions) non-IP call authentication solutions. NTCA is serving as Kalson Networks LLC's third-party representative on the ATIS non-IP taskforce working group.

As required to meet the non-IP network criteria for the continuing extension and consistent with § 64.6303 (a)(1), Kalson Networks LLC has contacted all of its connected carriers and requested to convert the non-IP connections to IP connections. The carriers, Lumen, Verizon and AT&T stated they cannot support IP connections at this time.

Kalson Networks LLC also originates calls via SIP connections within its network. Kalson Networks LLC has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Kalson Networks LLC has implemented STIR|SHAKEN within its network and signs the calls originating on the IP portions of Kalson Networks LLC's network.

Robocall Mitigation Plan:

All voice traffic that originates on Kalson Networks LLC's network is subject to the following Robocall Mitigation Plan.

All originating traffic on Kalson Networks LLC's network is routed through the SMART SHEILD service. This system uses call analytics to identify and monitor voice traffic consistent with illegal robocall campaigns and fraudulent calls.

The SMART SHEILD service also monitors call origination volume on customer lines and takes mitigation steps if a threshold volume is exceeded. Robocall mitigation takes place through this service automatically with no manual intervention required on the part of Kalson Networks LLC

Investigation

Kalson Networks LLC investigates calls identified by SMART SHEILD as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if Kalson Networks LLC has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Kalson Networks LLC will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent caller ID spoofing are prohibited on our network. If it is determined a Kalson Networks LLC customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Kalson Networks LLC will either warn the customer to stop such practices or terminate their service as allowed per Kalson Networks LLC policy.

Know Your Customer

Kalson Networks LLC has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Kalson Networks LLC thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

All end users receive access to the Kalson Networks LLC Utah Telephone Association Terms of Service agreement when new service is activated or existing service is renewed. The Terms of Service arrangement includes notice that Kalson Networks LLC prohibits use of its network for the initiation of fraudulent spoofing and robocalls. If end users are found in violate of the service terms, the end user's service may be terminated.

Know Your Upstream Providers

Kalson Networks LLC knows all carriers in which it exchanges traffic. Kalson Networks LLC, via the SMART SHEILD

Clear IP solution, proactively monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked, upon customer request, from entering Kalson Networks LLC's network to terminate.

Kalson Networks LLC has confirmed that all carriers in which Kalson Networks LLC exchanges traffic and from which Kalson Networks LLC receives traffic are listed in the Robocall Mitigation Database.

Kalson Networks LLC has reviewed the connected carrier's Robocall Mitigation Plans to learn how the carriers monitor their originating traffic to mitigation illegal robocalls.

Role In the Call Chain

Kalson Networks LLC is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. Kalson Networks LLC is also a voice service provider without a STIR/SHAKEN obligation on the non-IP portions of its network because that portion of Kalson Networks LLC's network relies on technology that cannot initiate, maintain, carry, process, or terminate SIP calls.

Traceback

Kalson Networks LLC commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Kalson Networks LLC will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Kalson Networks LLC has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Kalson Networks LLC has not been prohibited from filing in the Robocall Mitigation Database (RMD).