

Robocall Mitigation Program Description

Koo Inc.

FCC Registration Number (FRN): 0038475570

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1. Overview of the Filer

Koo Inc. is a Canadian managed service provider (MSP) that resells hosted voice (VoIP) service to a limited base of established business clients. Koo delivers voice service through third-party white-label hosted communications platforms operated by its underlying providers. Koo does not conduct bulk or high-volume outbound calling, does not operate telemarketing or mass-calling campaigns, and provisions service only to known, vetted business customers with whom it maintains a direct service relationship.

2. STIR/SHAKEN Status

Koo has not implemented the STIR/SHAKEN caller ID authentication framework on its own network. As a reseller, Koo does not own or control the network infrastructure necessary to implement STIR/SHAKEN and cannot register with the STIR/SHAKEN Policy Administrator or obtain a Service Provider Code (SPC) token. Caller ID authentication for calls originated by Koo's clients is performed upstream by Koo's underlying third-party platform providers, which control the relevant network infrastructure. Consistent with 47 CFR § 64.6301(a), Koo lacks a STIR/SHAKEN implementation obligation and maintains the robocall mitigation program described below.

3. Reasonable Steps to Avoid Originating Illegal Robocalls

Koo employs the following practices, consistent with 47 CFR § 64.6305(a):

- **Know-your-customer onboarding.** Koo provisions voice service only to vetted, established business clients with a verified, ongoing relationship. Koo does not sell service to anonymous, transient, or bulk-calling accounts, which substantially limits the risk of illegal robocall origination.
- **Caller ID integrity.** Outbound caller ID is restricted to telephone numbers assigned to or verified for the customer. Unauthorized caller ID spoofing is not permitted; Koo's underlying platforms likewise block spoofing of numbers not associated with the platform.
- **Platform-level authentication and robocall analytics.** Koo's underlying hosted communications platforms perform STIR/SHAKEN caller ID authentication and provide robocall analytics, detection, and blocking, and the underlying carriers identify and block illegal robocall traffic. Koo relies on these platform-level protections.
- **Privacy-respecting traffic review.** Out of respect for customer privacy, Koo does not proactively monitor the content of its customers' calls. When responding to a traceback request or a credible report of suspected illegal robocalling, Koo will obtain call detail records and related information from its underlying providers as needed to identify, investigate, and stop the offending traffic, up to and including suspending the responsible account.

4. Traceback Cooperation

Koo commits to respond fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the Industry Traceback Group, and to cooperate with those entities in investigating and stopping any illegal robocaller that uses Koo's service to originate calls.

5. Point of Contact

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