

Robocall Mitigation Plan (RMP)

Date of Filing: July 2026

Filer Legal Name: 2 KAHAN LLC

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FCC Registration Number (FRN): 0038648226

Provider Type: Voice Service Provider (Non-Facilities-Based)

1. Network Architecture and STIR/SHAKEN Implementation Status

Pursuant to 47 CFR § 64.6305, the filer submits this documented Robocall Mitigation Plan to the Robocall Mitigation Database. The filer operates as a non-facilities-based, over-the-top (OTT) cloud communications platform providing private, opt-in notification lines and IVR hotlines to closed community groups.

The filer does not hold an Operating Company Number (OCN), does not maintain direct physical interconnection to the Public Switched Telephone Network (PSTN), and lacks the network facilities necessary to implement STIR/SHAKEN caller ID authentication directly. All outbound voice traffic generated by the platform is routed via SIP directly to our underlying, facilities-based wholesale carrier (BulkVS). The filer relies entirely on its underlying carrier to apply STIR/SHAKEN attestation to all outbound traffic before it reaches the PSTN.

2. Robocall Mitigation Practices

To prevent the platform from being utilized to originate, carry, or facilitate illegal robocalls or unlawful telemarketing, the filer implements the following strict, multi-layered mitigation practices.

A. "Know Your Customer" (KYC) and Onboarding Verification

The platform enforces strict "Know-Your-Customer" measures to vet new customers before outbound calling capabilities are provisioned. The platform caters specifically to families, local community groups, and private events. Because these are closed groups, end-users opt-in to receive notifications via internal sign-up sheets or by directly dialing into the platform's inbound IVR system. Cold-calling, lead generation, and public telemarketing are strictly prohibited. To ensure compliance, the filer's team conducts manual, direct phone interviews to verify the identity and intended use case of new customers before unlocking their ability to send outbound broadcasts.

B. Automated Guardrails and Hard Rate Limiting

To physically prevent network abuse and ensure the platform is mathematically unviable for high-volume illegal robocalling, all active accounts are restricted by hardcoded rate limits at the software level.

- **Concurrent Call Limit:** Accounts are strictly restricted to a maximum of 15 concurrent active calls.
- **Daily/Monthly Volume Limits:** Unverified or standard accounts are capped at a maximum of 100 broadcast calls per day, and a maximum of 400 broadcast calls per month.

C. Manual Review for Capacity Scaling

If a legitimate community group requires a higher outbound call volume for their notifications, the platform does not allow automated scaling. The customer must undergo a secondary manual review process. The filer's team personally interviews the customer, reviews their historical traffic patterns, and verifies their opt-in consent practices before manually unlocking higher outbound capacities.

D. Continuous Traffic Monitoring

All outbound broadcast campaigns are logged, recorded, and monitored. If any account attempts to bypass rate limits or exhibits traffic patterns indicative of spam or toll fraud, the platform automatically halts the campaign and terminates the SIP connection to the underlying carrier. The associated account is suspended pending a manual investigation.

3. Traceback Cooperation and Law Enforcement Commitment

The filer is committed to actively preventing illegal robocalls and fully cooperating with the Commission, law enforcement, and the industry traceback consortium. The filer formally certifies its commitment to respond fully and accurately to all traceback requests within 24 hours of receipt. Upon receiving a traceback request, the filer will immediately identify the customer originating the traffic, suspend the offending account if unlawful activity is confirmed, and provide all requested routing and customer identification data to the requesting authority.