

Robocall Mitigation Plan

Business Information

Kalli, LLC
5308 NW 119 Terrace
Oklahoma City, OK 73162

Contact Information

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Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (2023) ("R&O"), it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

Kalli, LLC ("Kalli") is a small VSP dedicated to stopping illegal calls from traversing our network and monitoring the calls coming into our network.

As certified in the FCC's Robocall Mitigation Database, Kalli has fully implemented STIR/SHAKEN. In compliance with the R&O, Kalli submits this RMP and certification.

Know Your Customer ("KYC")

Kalli provides participant-connectivity service only to its parent company. The parent uses that service solely as an input to its administrative-hearing information-service / SaaS platform, which it offers only to vetted government agencies and does not resell as telecommunications. Kalli verifies the underlying government contracts provided by its parent company and limits the use of caller ID. Kalli does not offer any mass-calling or other robocalling capabilities.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls, and Call Authentication Trust Anchor*, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, 38 FCC Rcd 5404 (2023), Kalli provides the following information concerning its upstream voice service carrier.

Kalli has a master service agreement with its upstream provider and has received assurances in writing from its officials that it has, and will continue to, sign calls transmitted to Kalli and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Kalli. Kalli and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

Kalli's only customer is its parent company. Before using Kalli's service, the parent must agree to Kalli's AUP (or equivalent contractual acceptable-use terms). Among other things, those terms prohibit:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry-accepted guidelines; and
- using Kalli's service to engage in or in connection with fraudulent activities.

The parent is responsible for ensuring that users of its administrative-hearing information-service / SaaS platform (limited to vetted government agencies and their authorized participants) do not cause Kalli's service to be used in violation of the AUP. Kalli's agreement with its parent provides that Kalli may suspend or terminate the parent's service for AUP violations or related abuse.

Mitigation During Service

Kalli works with its upstream provider to ensure that Kalli's parent can report any suspicious call and measures are set to prevent future calls from/to the infringing individual numbers (none routed by the platform from that moment on – blacklisting).

Outbound calling associated with Kalli's service uses only authenticated, approved originating numbers. Number use is limited to numbers assigned or authorized for the end user's Appellate Hub/ hearing-session workflow. Kalli does not permit open dial-any-number origination.

Analytics for Monitoring Traffic; Investigate Suspicious Activity

Kalli works with its upstream provider to identify behaviors which may indicate illegal call activity.

If traffic analysis indicates the presence of likely illegal robocalling, Kalli will work with its upstream provider to follow defined procedures on investigating such end users.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;

- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the end user to validate that the activity belongs to that end user.

No third-party vendors are involved in deploying Kalli's analytics.

Kalli follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Kalli will devote sufficient resources to provide prompt and complete resources to traceback requests. Kalli commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Kalli works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to Kalli by its parent company or third parties. The investigation could potentially result in opening a traceback request or with Kalli contacting its parent company to track the improper use by the end user, or, if the end user does not respond or comply, to notify its upstream provider to block their use of the platform.

Blocking

Kalli will implement any Do Not Originate requests it receives from ITG. Kalli's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If Kalli and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, Kalli will take appropriate action which may include suspending or terminating the end user's use of Kalli's service. Kalli will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to response to the dynamic nature of mitigating illegal robocalling. Kalli will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, Kalli will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of David Carlton

I, David Carlton, Manager of Kalli, LLC ("Kalli"), do hereby certify, under penalty of perjury, the following:

- (1) Kalli has fully implemented STIR/SHAKEN in the IP portions of its network.
- (2) Kalli 's Business name and primary address are as follows:

Kalli, LLC
5308 NW 119 Terrace
Oklahoma City, OK 73162
- (3) Kalli has no other business names in use.
- (4) Kalli has not previously used any other business name.
- (5) Kalli has the following parent company: C2T Incorporated.
- (6) The following persons exercise management and control over Kalli: David Carlton and Greg Mantia.
- (7) Kalli has no other affiliates or subsidiaries.
- (8) None of the persons/entities in items 5 – 6 above have had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (9) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (10) Kalli's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation acting as a wholesale provider originating calls on behalf of another provider (its parent company).
- (11) Kalli has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (12) Kalli is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (13) Kalli is not required to have and does not have an operating company number.

David Carlton

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10/04/2026