KAMRAN TELECOM LLC

Robocall Mitigation Program Description

6755A 193 Lane, Apt 2C, Fresh Meadows, NY 11365

FCC Registration Number (FRN): 0039212147

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1. Company Overview

KAMRAN TELECOM LLC is a New York limited liability company providing wholesale and retail voice services. The company originates calls for its own subscribers and for verified wholesale customers over its own switching platform, handing traffic to its upstream voice service provider for completion and call signing.

2. Traffic Accepted

The company accepts only verified retail-profile and known wholesale traffic. We do not accept dialer traffic, auto-generated traffic, or short-duration traffic, and we do not knowingly originate illegal robocalls or traffic with spoofed caller identification.

3. Customer Vetting

Every wholesale customer is identity-checked (know-your-customer) before activation, including verification of the business, its principals, and its expected traffic profile. Retail accounts are individually provisioned; anonymous or self-service activation is not permitted.

4. Traffic Controls and Monitoring

Retail accounts are provisioned with per-account concurrent-call and daily-minute caps appropriate to their profile. All traffic is monitored continuously, including answer-seizure ratio and average call duration alarms and destination-pattern alarms, using an automated watchdog on the switching platform.

5. Enforcement

On any sign of illegal robocall traffic, the offending account or trunk is suspended immediately and investigated before any reinstatement. Accounts found to originate illegal robocalls are terminated.

6. Caller ID Policy

Caller ID is restricted to numbers the customer owns or is authorized to use. Customers may not present numbers belonging to third parties.

7. Traceback Cooperation

The company responds fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperates with such entities and with its upstream providers in investigating and stopping any illegal robocallers that use its service to originate calls.

8. STIR/SHAKEN Status

The company has not implemented the STIR/SHAKEN authentication framework on any portion of its network. Pursuant to 47 CFR 64.6304, the company is exempt from the implementation requirement of 47 CFR 64.6301 because it is unable to obtain a Service Provider Code (SPC) token: the STIR/SHAKEN Governance Authority token access policy requires an Operating Company Number (OCN), and the company does not hold an OCN. All calls originated by the company are handed to its upstream voice service provider, which signs calls under its own STIR/SHAKEN implementation.