



UNITED TELEPHONE ASSOCIATION, INC.
STIR/SHAKEN & Robocall Mitigation Plan - 2026

This Robocall Mitigation Plan is for *UNITED TELEPHONE ASSOCIATION, INC.*, located at 1107 W McArtor Road, Dodge City, KS 67801. This plan describes the reasonable and specific steps UNITED has taken to effectively avoid the processing of illegal robocall traffic on its network.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

UNITED TELEPHONE ASSOCIATION, INC. has not been prohibited from filing a certification in the Robocall Mitigation Database.

UNITED TELEPHONE ASSOCIATION, INC. does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

UNITED TELEPHONE ASSOCIATION, INC. uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

UNITED TELEPHONE ASSOCIATION, INC. follows the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our Telecommunications Acceptable Use Policy explicitly prohibits customers from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Know Your Upstream Provider

UNITED TELEPHONE ASSOCIATION, INC., has a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

UNITED TELEPHONE ASSOCIATION, INC. will respond promptly, and within 24 hours, to all traceback requests from the FCC, Law Enforcement, or the Industry Traceback Group. We will cooperate fully in the investigation and are committed to stopping illegal robocallers who use its service to originate or carry out illegal robocalling activities. If a pattern of questionable activity is detected, *UNITED TELEPHONE ASSOCIATION, INC.* will require its customer to remedy the problem immediately.

State and Federal Regulators

UNITED TELEPHONE ASSOCIATION, INC. will fully cooperate with state and federal regulators to prevent all illegal robocalls. Specially we will:

- respond to all valid local, state, and federal law enforcement requests.
- provide relevant information to reasonable and legitimate requests about illegal robocalls and fraudulent activities.

STIR/SHAKEN

UNITED TELEPHONE ASSOCIATION, INC. has registered with the STI-PA using **OCN 1841**. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.

UNITED TELEPHONE ASSOCIATION, INC. has fully implemented outbound STIR/SHAKEN on all IP portions of our network. All Voice traffic that originates on our, IP and non-IP segments of our network, continues to be subject to the robocall mitigation program described below.

We are exempt from STIR/SHAKEN implementation requirements for some calls because these calls rely on non-IP technology - **47 CFR 64.6304(d)**.

Steps for Prevention of Illegal Robocalls

UNITED is dedicated to stopping illegal robocalls. Here are some of the things we have in place to detect and prevent fraudulent traffic on our network.

- *UNITED TELEPHONE ASSOCIATION, INC.* has in place an enforceable Terms of Use and Acceptable Use Policy.
 - In accordance with our AUP, users are prohibited from engaging in any activity that is illegal or infringes on the rights of others.
 - Prohibited Activities include: Robocalling, Caller ID Spoofing, Fraudulent Activities, Harassment, and Network Abuse.
 - Consistent with our AUP, United reserves the right to take appropriate action against any user who violates these terms, including service suspension, termination, and legal action.
- *UNITED TELEPHONE ASSOCIATION, INC.* uses “ClearIP” software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls.
 - The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation.
 - The Software also has analytics to detect fraudulent activity due to fast number pumping, international toll fraud, and Robocalling by group numbers.
- *UNITED TELEPHONE ASSOCIATION, INC.* will immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we warn them to stop immediately. If an effective solution is not taken, then we will suspend or terminate the customer’s service as appropriate.