

Robocall Mitigation Plan (RMP)

Provider Type: Facilities-Based / VoIP Voice Service Provider Serving End Users

STIR/SHAKEN Obligation: Yes (Implemented)

- The provider has fully implemented STIR/SHAKEN authentication and verification on all SIP interconnections where technically feasible.
- Legacy TDM local exchange facilities are interconnected via a MetaSwitch softswitch, and calls are authenticated and verified at the SIP network edge using TransNexus as the STI-AS and STI-VS.
- Due to SS7 signaling limitations, PASSporT information cannot be preserved across TDM segments; however, all IP ingress and egress traffic is subject to STIR/SHAKEN and robocall mitigation consistent with FCC requirements.

Provider Identification

- **Legal Company Name:** United Telephone Company
- **FCC Registration Number (FRN):** 5069299
- **Business Address:** 120 Taylor St, Chapel Hill, TN 37034
- **Website:** <https://www.united.net>

This Robocall Mitigation Plan (RMP) is maintained in accordance with 47 CFR §64.6305 and related FCC robocall mitigation and STIR/SHAKEN rules.

Network Overview

United Telephone Company provides voice service directly to end users using an IP-based voice network. The network supports outbound and inbound voice calls to and from the Public Switched Telephone Network (PSTN). The company operates session border controllers (SBCs) and associated call control platforms to manage call origination, termination, routing, and signaling.

STIR/SHAKEN Implementation

United Telephone Company has implemented STIR/SHAKEN in compliance with FCC requirements applicable to voice service providers serving end users.

- Registered with STI-PA using OCN 0581

- Certificate issued by the TransNexus Certification Authority (STI-CA)
- All outbound calls originated on the network are authenticated using STIR/SHAKEN.
- Calls are signed with appropriate attestation levels based on customer verification and calling number assignments.

Any traffic that cannot be authenticated is subject to the mitigation measures described below.

Know-Your-Customer (KYC) Procedures

Prior to provisioning voice service or enabling outbound call origination, United Telephone Company performs customer due diligence, which includes:

- Verification of customer identity and business legitimacy
- Collection of legal business name, address, and contact information
- Validation of authorized users and intended use of service
- Review of expected calling patterns and volumes
- Contractual prohibitions against illegal robocalling, spoofing, and fraud

Customers are informed that violations of robocall policies may result in traffic blocking, suspension, or termination.

Calling Number Management

United Telephone Company assigns or authorizes calling telephone numbers only after verifying the customer's right to use such numbers. This includes:

- Assignment of numbers directly from the provider's inventory, or
- Validation of customer-provided numbers through documentation or industry databases

Unauthorized or invalid calling numbers are not permitted on the network.

Traffic Monitoring and Analytics

United Telephone Company monitors outbound call traffic for indicators of illegal or unwanted robocalling, including but not limited to:

- High call volumes or abnormal call velocity
- Short-duration or unanswered call patterns
- Repeated calls to sequential or random number ranges
- Calls using invalid, unallocated, or spoofed calling numbers

Monitoring is performed using TransNexus ClearIP:

- Analytics
 - Telecom fraud prevention
 - Robocall and TDoS prevention
 - STIR/SHAKEN caller ID authentication and verification
 - Do-Not-Originate (DNO) blocking
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Mitigation and Enforcement Actions

When suspicious or illegal robocall activity is detected, United Telephone Company may take one or more of the following actions:

- Contact the customer to investigate the traffic
- Require corrective action or documentation
- Block or throttle outbound traffic
- Suspend or terminate service

Actions are proportionate to the severity and persistence of the activity.

Upstream and Downstream Coordination

United Telephone Company cooperates with upstream and downstream voice service providers to mitigate illegal robocalls. This includes:

- Responding promptly to traceback requests from the Industry Traceback Group (ITG)
 - Coordinating blocking or mitigation actions when notified of illegal traffic
 - Sharing relevant call information consistent with legal and privacy obligations
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Recordkeeping

United Telephone Company maintains records related to robocall mitigation efforts, including:

- Customer onboarding and verification records
- Call detail records (CDRs)
- Investigations and enforcement actions

Records are retained for a minimum of **12 months** or longer if required by law or regulation.

Plan Maintenance and Updates

This Robocall Mitigation Plan is reviewed periodically and updated as necessary to reflect changes in network operations, FCC rules, or mitigation practices. Any material changes are reflected in the FCC Robocall Mitigation Database in accordance with FCC requirements.

Principals, Affiliates, and Parent/Subsidiary

- Principals/Officers
 - CEO
 - William Bradford
 - Email: wbradford@gounited.net
 - NOC: noc@gounited.net
 - Phone: 931-364-4355
 - CFO
 - Kristin Jackson
 - Email: kjackson@gounited.net
 - Phone: 931-364-4325
- Affiliates
 - UTC Long Distance, LLC
 - United Communications, Inc.
 - Loretto Telephone Company
 - Loretto Communication Services, Inc.
- Parent/Subsidiary
 - United Communications, Inc. (100% wholly owned subsidiary of United Telephone Company)
 - United Communications Holdings, LLC (100% owner of United Telephone Company)
 - MTE Holdings, LLC (majority owner of United Communications Holdings, LLC)

- Middle Tennessee Electric Membership Corporation (100% owner of MTE Holdings, LLC)