

UNICOM TELECOM INC.

ROBOCALL MITIGATION PLAN

Introduction

This document describes the reasonable steps taken by Unicom Telecom Inc. ("Unicom Telecom") to mitigate and prevent unlawful robocalling. Unicom Telecom provides interconnected Voice over Internet Protocol ("VoIP") services on a resale-only basis and does not directly interconnect with the Public Switched Telephone Network (PSTN). Unicom Telecom is committed to complying with applicable FCC regulations concerning robocall mitigation.

Service Model and Upstream Providers

Unicom Telecom is a non-facilities-based reseller. STIR/SHAKEN authentication, call signing, and network-level robocall mitigation functions are performed by its upstream providers: SkySwitch (FCC Robocall Mitigation Database Filing RMD0002940) and White Label Communications, LLC (FCC Robocall Mitigation Database Filing RMD0003583). Unicom Telecom relies on these upstream providers for implementation of STIR/SHAKEN authentication and network-level traffic analytics and does not operate its own network infrastructure for PSTN interconnection or independent call signing.

Know Your Customer Procedures

Prior to activating service, Unicom Telecom performs reasonable due diligence to verify customer identity, including confirmation of business name, business address, authorized representative information, and intended use of services. Customers are required to agree contractually to terms prohibiting unlawful robocalling, spoofing, and fraudulent voice activity. Unicom Telecom reserves the right to reject, suspend, or terminate service where unlawful activity is suspected or confirmed.

Traffic Monitoring and Mitigation

Unicom Telecom relies primarily on its upstream providers for network-level traffic monitoring, analytics, and identification of suspicious calling patterns. These providers utilize call analytics systems to detect anomalous traffic, including unusual call volumes, short-duration calls, low completion rates, sequential dialing patterns, and other indicators of potential unlawful robocalling. Upon notification of suspicious activity by an upstream provider, traceback entity, law enforcement agency, or other credible source, Unicom Telecom will promptly investigate the customer account and take appropriate mitigation measures, which may include requesting documentation, restricting calling privileges, suspending service, or terminating service.

Traceback Cooperation

Unicom Telecom responds within 24 hours to traceback requests received from the FCC, law enforcement agencies, the USTelecom Industry Traceback Group, or other authorized entities. Upon receipt of a traceback request, Unicom Telecom will identify the relevant customer account and cooperate in providing responsive information. If unlawful robocalling is confirmed and not

remediated, Unicom Telecom will suspend or terminate service.

Telephone Number Use and Caller Identification

Subscribers may use only telephone numbers that are obtained by Unicom Telecom from its upstream providers and assigned to the customer's account, or numbers that have been properly ported and validated through standard porting procedures. Unicom Telecom controls number assignment at the account level but does not independently perform STIR/SHAKEN call signing. STIR/SHAKEN authentication and attestation are applied by upstream providers in accordance with their authentication policies and based on number assignment and customer verification. Unauthorized, misleading, or spoofed caller identification is prohibited.

International Service Status

Unicom Telecom is a non-facilities-based reseller and does not directly interconnect with foreign telecommunications networks. Unicom Telecom may provide service to customers that operate internationally, including customers with US-based business registrations and EINs. All voice services, including any traffic that may originate from outside the United States, are provided and authenticated through Unicom Telecom's upstream domestic carriers. Unicom Telecom relies on its upstream providers for STIR/SHAKEN authentication and compliance with applicable FCC requirements related to foreign-originated traffic.

Robocall Mitigation Contact

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Traceback Contact

Unicom Telecom designates the following individual as the primary contact for all traceback requests from the FCC, law enforcement agencies, the USTelecom Industry Traceback Group, and other authorized industry entities. This contact is authorized to respond to traceback requests within 24 hours and coordinate internal investigations and mitigation actions.

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