

Unified Voice – Robocall Mitigation Plan

Filer ID: 835033

Unified Voice, LLC

Role in Call Chain: Gateway Provider

September 24, 2025

1. Regulatory Basis

Unified Voice submits this Robocall Mitigation Plan in compliance with the TRACED Act and the Federal Communications Commission's rules. As a gateway provider, Unified Voice is responsible for ensuring that international calls entering the U.S. are properly authenticated, signed, and screened for unlawful robocalls. This plan reflects both the technical implementation of STIR/SHAKEN and the broader operational safeguards we employ to protect the U.S. voice ecosystem.

2. Provider Role & Network Overview

Unified Voice operates as a gateway provider. We accept traffic from offshore clients, route it through our U.S.-based switching platform, and then deliver it to U.S. carrier partners for final PSTN termination. Because many of our offshore customers do not have their own STIR/SHAKEN tokens, Unified Voice assumes the responsibility of authenticating and signing their calls at the U.S. network edge. This approach provides accountability and ensures compliance with FCC requirements.

3. STIR/SHAKEN Implementation

Unified Voice has obtained a valid STI certificate and performs full STIR/SHAKEN authentication on all calls it accepts from offshore customers. As the signing authority, we apply Attestation Level "A" where both customer identity and number ownership are verified, and Attestation Level "B" where customer identity is verified but number ownership cannot be confirmed. Inbound calls containing foreign tokens are validated where technically feasible. This ensures all calls that Unified Voice brings into the U.S. network are appropriately authenticated.

4. Robocall Mitigation Practices

Unified Voice's mitigation framework combines rigorous Know Your Customer (KYC) vetting, real-time analytics, Code 600/603 screening, and industry collaboration. Together,

these measures significantly reduce the likelihood of unlawful robocalls entering the U.S. from our network.

Our KYC process is extensive. Before any service is activated, customers must provide incorporation documents, business registration, tax ID numbers, the nature and size of their business, and whether auto-dialers are used. This information is retained electronically and reviewed regularly. Unified Voice contracts explicitly prohibit unlawful robocalls, and customers agree to random monitoring and mandatory cooperation with traceback requests.

Once service begins, traffic is constantly monitored. Through the 1Call Connect switching and fraud management platform, we track metrics such as ASR, ACD, ANI, and DNIS data. Alerts are generated for suspicious spikes in traffic or unusual calling patterns. Our compliance team investigates, and if unlawful activity is suspected, Unified Voice takes corrective measures ranging from warnings to blocking or suspending service.

Unified Voice screens all calls against industry Do-Not-Originate (DNO) lists and blocks those with invalid, unassigned, or unallocated numbers. We also enforce Code 600 and 603 reject policies for spoofed or unverifiable caller IDs, ensuring that fraudulent calls cannot be introduced into the PSTN.

5. Network Tools & Advanced Monitoring

Unified Voice employs a layered approach to monitoring. This includes ANI management software to block unlawful numbers, proactive blocking against DNO sources, whitelisting of verified numbers, and real-time fraud analytics. In addition, Unified Voice supplements traditional monitoring with artificial intelligence and machine learning systems. These tools provide anomaly detection, traffic reputation scoring, and deeper insights into evolving robocall patterns. We participate in the development of next-generation fraud detection solutions, including AI-based initiatives with industry partners, to stay ahead of increasingly sophisticated robocall tactics.

6. Traceback Cooperation

Unified Voice is a registered participant in the USTelecom Industry Traceback Group and responds promptly to all traceback requests, typically within 24 hours. We cooperate fully with the Commission, law enforcement, and industry stakeholders to identify and stop unlawful robocalling at its source.

7. Traffic Handoff to U.S. Carriers

Once authenticated and screened, traffic is handed off to U.S.-based carriers for final termination. Unified Voice maintains contractual obligations with these carriers to ensure compliance with STIR/SHAKEN and FCC rules across the entire call chain.

8. Ongoing Compliance & Updates

We treat robocall mitigation as an evolving responsibility. Our compliance team performs quarterly audits of traffic and customer accounts, and this plan is updated as FCC requirements change. Any customer found to be in violation is subject to immediate action, including traffic blocking, suspension, or termination of service.

9. Certification & Contact

I certify that Unified Voice, LLC operates in full compliance with FCC robocall mitigation requirements as a gateway provider, and that the practices described in this plan are actively implemented.

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