



February 4, 2026

To: Federal Communications Commission Consumer and Governmental Affairs Bureau
445 12th Street SW Washington, DC 20554

From: Go2Uno, LLC
10564 Sentinel Dr
San Antonio, TX 78217
FRN: 0030294474

Subject: Go2Uno, LLC Robocall Mitigation Plan submittal recertification

This letter is to update periodically and continue to improve Go2Uno, LLC's Robocall Mitigation Database submittal with new information when it becomes available. This submittal is to be considered the current version.

All voice services providers submit a plan to FCC Robocall Mitigation Database detailing and certifying how they ensure mitigation of illegal robocalls in their network.

Purpose: Go2Uno is dedicated to stopping illegal calls from originating or passing through our network.

Per FCC requirements, UNO has developed a Robocall Mitigation Plan that:

- Is compliant with the TRACED (Telephone Robocall Abuse Criminal Enforcement and Deterrence) Act.
- Cooperates with investigators, federal/state/local regulatory agencies as well as criminal law enforcement with the intent to stop illegal robocalls.
- Commits to respond to traceback requests with the intent to stop illegal robocalls.
- Is registered and filed in the FCC Robocall Mitigation Database.
- Details the reasonable steps taken to avoid originating illegal robocalls.
- Follows all FCC guidelines relevant to "Know Your Customer."
- Implements full STIR/SHAKEN protocols.

As a Voice Service and Gateway provider serving both end users and in a wholesale's capacity, UNO certifies:

- Full STIR/SHAKEN protocols have been implemented as well as additional robocall mitigation.
- That its switching platform follows required industry traceback standards
- Commitment to respond to all traceback requests within 24 hours upon notice from the Commission, law enforcement, other federal, state, and local regulatory enforcement organizations, and/or the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate or pass calls.
- That all voice traffic originating on our network is subject to our robocall mitigation program
- Do Not Originate "DNO" queries and Do Not Call lists are utilized to confirm compliance with proper DNO requirements.
- Know Your Customer ("KYC") documentation and measures have been implemented and are reviewed periodically to ensure compliance.
- ANIs and DNISs are tracked and documented from customer through vendor delivery, including all voice "hops" and stored for 90-days.
- Originating and terminating numbers are tracked for irregular behavior including, High Volume / Short Duration Traffic, Calls to Unallocated Numbers, and calls from numbers that exist on a known robodialer list.
- We deploy filtering for both inbound and outbound traffic to our voice network.
- UNO collaborates with its upstream carriers to detect calling patterns consistent with illegal robocalls.
- Customers requesting excessive number of calls per second "CPS" are screened for legitimate usage needs.
- New and existing customers with an excessive number of call paths may receive Robocall outreach.

- Go2Uno, LLC has not been prohibited from filing a certification in the FCC Robocall Mitigation Database.
- Neither Go2Uno, LLC nor any of its executives have a history of enforcement actions related to illegal robocalls, violations of the Telephone Consumer Protection Act (TCPA), Telemarketing Sales Rule (TSR), or any related state law violations.
- We will continually monitor industry regulation and best practices for updates to this plan. We will monitor and analyze our call traffic to ID new robocall threats and patterns allowing us to adapt our mitigation strategies to effectively address emerging challenges.

Next Hop Carriers: As an example, Go2Uno utilizes Lumen (RMD Database ID: 0018626853) and Verizon Business (RMD Database ID: 0029611803) as next hop carriers in its call routing architecture.

STIR/SHAKEN Implementation.

UNO has implemented STIR/SHAKEN (Secure Telephony Identity Revisited/ Secure Handling of Asserted information using token's) an industry framework developed to prevent the completion of calls where the originating provider does not own or is not authorized to use the Caller ID associated with the call (a "spoofed call"). Through the implementation of STIR/SHAKEN, UNO verifies the authenticity of caller identification information to prevent caller ID spoofing and provides customers with accurate information about incoming calls. We will maintain and regularly update a Do Not Originate (DNO) list, containing numbers that are not authorized to be used for outbound calls. This list will be shared with our voice service providers to prevent the initiation of illegal robocalls. We will ensure only consumers who 'opt in' are contacted from across our network. We will attest calls across our network based on the criteria set forth by the FCC:

- A-Level Attestation (Full). A trusted customer/subscriber on the UNO network that has the right to use this number. All numbers provided by UNO to a trusted subscriber will be signed with an A-Level Attestation token.
 - o If the trusted customer/subscriber has numbers from other providers that will route through the UNO network these calls will be signed with a "B" token. If the trusted customer/subscriber provides and signs UNO's "Know Your Customer Form" indicating the customer's certification that they are authorized to attest to these numbers, then UNO will sign these calls with an "A" token.
- B-Level Attestation (Partial). A trusted customer/subscriber on the UNO network using a number not provided by UNO or certified by the customer/subscriber.
- C-Level Attestation (Gateway). If UNO establishes an international gateway, or for all other instances when UNO can only verify that the call is coming from a known gateway but cannot authenticate the call source, UNO will sign these calls with a "C" token.

STI-PA Registration and Certificate Authority: Go2Uno has registered with the Secure Telephone Identity Policy Administrator (STI-PA) using Operating Company Number (OCN) 186K. We maintain our own STIR/SHAKEN certificate issued by Martini Security, an approved Certification Authority (STI-CA), which is used to authenticate calls originating from our network.

Traceback Requests, Fraudulent Traffic and Procedure

Go2Uno is a member of the US Telecom Industry Traceback Group ("ITG") utilizing ITG best practices and cooperating with all ITG traceback investigations with dedicated resources, responding to all traceback requests within 24 hours or less.

When notified or becoming aware through traffic analysis the presence of likely illegal robocalling, UNO will identify the party that is using our network to originate fraudulent calls and will take appropriate action. Action may include initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and/or suspending or terminating the party's ability to originate calls on our network.

Enforcement Procedure:

Strike 1 (first incident):

- Notify the customer about the incident and request to remove faulty call origination party.

Strike 2 (second incident involving same customer):

- Reach out to customers in separate communication notifying them of the second strike.
- Request customer Robocall/Fraud mitigation procedures for Go2Uno records.
- Review and if applicable, make recommended adjustments to customer Robocall/Fraud mitigation processes.

Strike 3:

- If no procedures are presented – suspend all customer activity until resolution is provided.
- Notify Customer a written response is required that includes both explanation of the incident(s) and written documentation of the process to cure in order for Uno to re-establish providing services.

*Strike Policy – Any client who acquires a “strike” remains under review and in process until they have gone 60 days without an incident. A customer who has provided the requested documentation AND gone 60+ days without incident is then released from the mitigation process until such time another incident is reported.

Our Customer Care Center follows our predefined procedures to perform all illegal call investigations including checking and validating:

- Recent and past call detail records and benchmark against expected trends.
- Recent and past account activity; and,
- Contacting the customer to understand their particular use of service and validate that the activity belongs to that specific customer directly.

We will not carry traffic for another provider if they are not listed in the Robocall Mitigation Database and are committed to making all best efforts to immediately halt, suspend and/or terminate passing the traffic for any provider delisted from the RMD.

Blocking Suspicious or Illegal Traffic

Go2Uno will implement Do Not Originate requests it receives from the ITG. We currently block all calls included in the ITG DNO Database and if our monitoring systems identify suspected robocalling patterns that are confirmed after investigation, we take appropriate action. Such action may include blocking, suspending, or terminating the customer's use of Go2Uno network.

Go2Uno utilizes the 46 Labs Peeredge tool as its switching platform including its many resources and capabilities to combat illegal calling activities:

- **Real-time Monitoring and Analytics:** Centralized view of voice traffic, enabling monitoring of call patterns in real time. This allows for the identification of suspicious activity, such as high volumes of short duration calls or calls originating from unusual locations, which are often indicators of illegal robocalling or spam campaigns.
- **Fraud Prevention and Filtering Mechanisms:** Configured to identify and block or flag calls based on various parameters, including originating numbers, calling patterns, and known blacklists of fraudulent numbers.
- **Number Management and Validation:** Ensuring legitimacy of originating and terminating numbers by validating numbers and identifying potential spoofing attempts, therein reducing incidence of illegal calls.
- **Call Traceability and Forensics:** Tools for tracing the origin and path of calls crucial for investigations and cooperating with US Telecom Industry Traceback Group (ITG)
- **Reporting and Alerting:** Setting custom alerts to be notified of suspicious call activity, and detailed reports helping identify trends and patterns of illegal calling.
- **Integration with Law Enforcement and Industry Databases:** The ability to ultimately integrate with law enforcement databases and industry-shared threat intelligence, further enhancing Go2Uno's ability to identify and block known sources of illegal calling.
- **Compliance and Regulatory Tools:** Helping stay compliant as industry regulations around illegal calling evolve (e.g., the TRACED Act in the US), by providing tools to implement necessary measures, such as STIR/SHAKEN authentication where applicable.

**Consumer Education**

We make every effort possible to proactively educate our customers about robocalls, their risks, and how to protect themselves. This includes information on call-blocking tools, reporting mechanisms, and best practices to avoid falling victim to robocall scams. In the future, we have plans to conduct public awareness campaigns through various channels, such as social media, blog posts, and customer newsletters. These campaigns will emphasize the importance of robocall mitigation and encourage customers to report suspicious calls.

Reporting and Cooperation

We provide a reporting mechanism for our customers to report unwanted and suspicious calls that we investigate and take appropriate action on.

Industry Collaboration

We actively participate in industry forums and have plans for other industry working groups, and collaborations aimed at sharing best practices, developing technologies, and collectively addressing the robocall problem.

Summary

UNO is committed to the robocall mitigation measures and practices described herein to protect our customers and contribute to the collective efforts to eradicate illegal robocalls. We understand the importance of this issue and are dedicated to continuously improving our processes and technologies.

Sincerely,
Jeff Watson
COO, Go2Uno, LLC
Jeff.watson@go2uno.com
210.771.4109