

Robocall Mitigation Program Certification

1. Program Overview

United Internet Services has developed and implemented a comprehensive Robocall Mitigation Program ("RMP") to detect, prevent, and remediate the origination of unlawful robocalls in strict compliance with the Federal Communications Commission (FCC) regulations, including 47 CFR § 64.6305. This program applies to all voice traffic originated, routed, or terminated via our network, encompassing direct end-user origination, wholesale partnerships, and interconnected VoIP services.

Our RMP employs a multifaceted approach that integrates robust call authentication, advanced traffic analytics, rigorous customer vetting, and continuous monitoring to ensure that only lawful, compliant traffic is permitted on our network.

2. Call Authentication (STIR/SHAKEN)

We have implemented the STIR/SHAKEN call authentication framework for all SIP-based traffic. All outbound calls over IP interconnections are signed using our authorized SHAKEN certificate.

3. Customer Vetting & Onboarding

All prospective customers are subject to a stringent, multi-phase identity verification and use case validation process prior to activation:

Stage 1

- 1) Verification of email address.
- 2) Verification of mobile telephone number.
- 3) Acceptance of Terms & Conditions, including logging of IP address and date of acceptance.

Stage 2

- 4) Submission of a state-issued driver's license or government-issued photo ID.
- 5) Address verification through a utility bill or mobile telephone bill.
- 6) Submission of a live photo holding the ID for verification.
- 7) Completion of a Traffic Use-Case Verification form to confirm lawful intent of calling activity.

Prohibited activities include unlawful prerecorded or autodialed calls (with or without consent) and call campaigns utilizing falsified or spoofed Caller ID information. Customers must agree to our Acceptable Use Policy (AUP) and Robocall Compliance Agreement. All collected information is validated and securely stored in our compliance database. [Loom Documenting the 2 stage process.](#)

4. Ongoing Monitoring & Analytics

We employ advanced, real-time call analytics to detect abnormal or potentially unlawful calling patterns, including:

- Automated penalties for high-volume, short-duration call patterns.
- Limiting simultaneous call origination to three (3) calls per second.
- Prohibiting invalid or unallocated Caller ID numbers via pattern matching and regular expression.

Any detected anomalies trigger immediate investigation and, where appropriate, enforcement actions. This is done with IBM Cloudant with custom map reduce functions which are run on the caller record database in realtime. They are also the caller record storage company.

5. Traceback & Enforcement Cooperation

United Internet Services is an active participant in the Industry Traceback Group (ITG) and

responds to traceback requests within 24 hours. We maintain close coordination with law enforcement agencies and regulatory bodies in the identification and mitigation of illegal robocall traffic. Confirmed violations result in immediate suspension or termination of service. We have a zero tolerance policy.

6. Employee Training

All personnel responsible for provisioning, onboarding, and network operations undergo comprehensive training on FCC robocall rules, identifying red flags, and enforcement processes. Annual refresher courses ensure that compliance awareness and operational standards remain current.

7. Reporting & Record keeping

Call Detail Records (CDRs) are retained for a minimum of twelve (12) months to facilitate traceback and enforcement. Packet capture (PCAP) data is retained for thirty (30) days. Records of all customer vetting, mitigation measures, and enforcement actions are meticulously documented. We submit and maintain all required FCC Robocall Mitigation Database filings and updates in a timely manner. As mentioned earlier the records are stored at IBM.

8. Enforcement & Disciplinary Measures

United Internet Services enforces a zero-tolerance policy toward illegal robocall activity. Violations are escalated from formal warning to service suspension, with immediate termination for egregious or repeated offenses. All confirmed violations are reported to the FCC, FTC, and other relevant enforcement bodies.

9. Program Review & Updates

This Robocall Mitigation Program is reviewed annually, and updated as necessary, to reflect changes in FCC regulations, advancements in robocall detection technologies, and evolving industry best practices.

10. Prior Investigations

Yes – Removal from RMD on Aug 6, 2025 for DA 25-694 (RMD0004909) .

Prior to this, we have not been the subject of any formal Commission, law enforcement, or regulatory agency action or investigation resulting in findings of actual or suspected wrongdoing related to the transmission, encouragement, assistance, or facilitation of illegal robocalls or spoofing by the filing entity. To date, there have only been 22 ITG requests covering a customer base of 37,712 numbers in route, representing a diverse mix of residential and business customers. Additionally, we maintain 25,178 numbers directly routed to Granite Communications for the Epik Service.

Granite Epik Edge: <https://www.granitenet.com/solutions/granite-labs/epik-edge/>

11. Outbound Caller ID Restrictions

We limit our outbound caller id to numbers that are in service or authorized. Authorization is granted for external caller id by one of two methods:

- Mobile Fast Path
- Manual Authorization

Screenshots of both are below:

[Add External Caller ID](#)[My External Caller IDs](#)[Logout](#)

Add External Caller ID

Adding an External Caller ID: There are two methods for adding an external Caller ID to your account:

- Mobile Fast Path** – Send a text message to **(888) 206-5060** stating:
"I **AUTHORIZE** the use of my Caller ID to Michael J. Mavroudis as an **OUTBOUND CALLER ID** number." 
(Please copy and paste the text exactly as shown, as the message is case-sensitive.)
- Manual Authorization** – Complete the authorization form [here](#).

Once either authorization method is completed and **verified**, you will be able to successfully add the phone number using the form below.

Alternative option: You may also choose to [port](#) the number into our service.

Phone Number:

Enter 10 digits without punctuation

Justification:
 0/255
Brief explanation for this caller ID assignment

[Add Caller ID](#)[Clear Form](#)

[External Caller ID Authorization](#)[Logout](#)

[External Caller ID Authorization](#)

Business / Personal Information

Full Name Company Name

Address City

State Zip Code

Email Main Telephone No

External Numbers to Authorize

List of External Phone Numbers

Proof of Ownership [Browse...](#) No file selected. Upload a recent bill or account statement clearly showing each phone number and the account holder's name.

Legal Agreement

By enabling the use of an external Caller ID on the United Internet Services platform, you ("The User") represent, warrant, and certify that:

- You are the legal owner of, or have express written authorization from the legal owner of, each telephone number listed above.
- You will provide verifiable proof of ownership or authorization for each number, such as a current billing statement clearly displaying the number and your (or the authorized party's) name.
- You will comply with all applicable laws, regulations, and industry guidelines regarding the use of Caller ID information, including but not limited to the Truth-in-Caller ID Act (FTC, 16 C.F.R. § 312.27(a)) and related FCC rules.
- You agree to fully indemnify, defend, and hold harmless United Internet Services, its affiliates, officers, employees, and agents from and against any and all claims, damages, liabilities, costs, and expenses (including reasonable attorney's fees) arising out of or related to: unauthorized use of an external Caller ID; any inaccuracy, falsity, or omission in the proof provided; or any violation of applicable laws or regulations.
- United Internet Services reserves the right, in its sole discretion, to revoke permission to use an external Caller ID at any time without notice if the documentation is insufficient, inaccurate, fraudulent, or expired, or if continued use presents legal or reputational risk.

☐ I have read and agree to the above terms.

Signature

Printed Name

Title

Date

Draw Signature (inmate or touch)

12. Designated Point of Contact

For all matters related to this Robocall Mitigation Program, including regulatory inquiries, traceback coordination, and enforcement actions, the designated point of contact is:

Michael J. Mavroudis

President

United Internet Services

411 Hackensack Avenue, Suite 200, Hackensack NJ 07601

Phone: (888) 206-5060

Email: support@usivcs.com

Authorized Signatory

For and on behalf of **United Internet Services**

Name: Michael J. Mavroudis

Title: President

DocuSigned by:

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Date: 11/26/2025