

Robocall Mitigation Plan for UT&T LLC

FCC Registration Number (FRN): 0020589032

Business Name: UT&T LLC

Business Address: PO Box 254, Spring Arbor, MI 49283-254, United States

Point of Contact: Ross Devereaux, CEO | 517-206-2065 | ross@50tel.com

Date: March 30, 2026

I. Introduction

UT&T LLC is a U.S.-based B2B interconnected VoIP provider serving business end users. UT&T LLC provides hosted PBX and related voice services to business customers using the Viirtue multitenant PBX platform. UT&T LLC operates in a bring-your-own-carrier model and independently manages its upstream carrier relationships for call origination, termination, DID provisioning, number porting, SIP routing, and customer call flow configuration.

UT&T LLC currently uses VoIP Innovations / Sangoma Wholesale as a primary upstream carrier for inbound and outbound call routing and related origination services. UT&T LLC understands that, as a provider serving the end user and originating traffic into the public switched telephone network, it must maintain an accurate Robocall Mitigation Database filing and describe the affirmative, effective measures it takes to prevent the origination of illegal robocall traffic.

II. Mitigation Program Overview

A. Affirmative, Effective Measures to Prevent Illegal Robocalls

UT&T LLC has adopted customer onboarding, contractual, traffic-monitoring, traceback, and escalation procedures designed to prevent its network and services from being used to originate illegal robocalls, unlawful spoofing, or other unlawful calling activity.

B. Know Your Customer (KYC) Procedures

Before activating service for a new customer, UT&T LLC performs a business-customer review that includes, as applicable:

- verification of legal business name and business address;
- review of Secretary of State or comparable business registration records;
- collection and review of EIN / tax identification information;
- collection of responsible business contact information;

- review of the customer's stated business purpose and intended calling use case;
- review of whether the customer expects to engage in outbound calling and, if so, the expected calling profile, calling volume, and nature of that traffic; and
- confirmation that the customer accepts contractual terms prohibiting illegal robocalling, spoofing, transmission of unlawful traffic, or use of service in violation of federal or state law.

UT&T LLC does not activate service until its onboarding review is completed.

As part of that review, UT&T LLC evaluates whether the proposed customer relationship presents heightened robocall risk. Elevated-risk factors may include unusually high anticipated outbound traffic volumes, calling campaigns inconsistent with the customer's described business, use cases associated with telemarketing or mass outbound calling, materially incomplete onboarding information, or any other facts suggesting a risk of unlawful traffic.

UT&T LLC also reassesses customers when circumstances materially change, including when a customer seeks significantly expanded outbound calling capacity, adds substantial new DID inventory, changes use cases, or generates traffic patterns inconsistent with its onboarding profile.

C. Analytics, Monitoring, and Traffic Review

UT&T LLC uses operational controls and traffic monitoring to detect suspicious or anomalous traffic patterns.

These controls include:

- outbound dialing limits configured within the hosted PBX environment;
- upstream-carrier thresholds and limits applied through VoIP Innovations / Sangoma Wholesale;
- review of usage alerts when customer calling exceeds expected thresholds;
- investigation of traffic anomalies, volume spikes, or calling behavior inconsistent with the customer's represented use case; and
- escalation procedures that may include customer contact, temporary restriction, suspension, or termination.

Analytics disclosure:

Use one of the following two versions, depending on your actual setup.

UT&T LLC relies in part on analytics or monitoring services provided by its upstream provider, VoIP Innovations / Sangoma Wholesale, together with UT&T LLC's own internal traffic review, PBX controls, and alerting. To the extent analytics are provided by an upstream provider rather than UT&T LLC directly, UT&T LLC identifies that upstream provider here as required by FCC guidance.

D. Contractual Controls and Enforcement

UT&T LLC's customer agreements prohibit illegal robocalling, unlawful spoofing, deceptive caller-ID practices, and use of UT&T LLC services to transmit unlawful traffic. UT&T LLC reserves the right to restrict, suspend, or terminate service where evidence indicates suspicious, unlawful, or non-compliant call activity.

If suspicious traffic is identified, UT&T LLC may take one or more of the following steps, depending on the circumstances:

- contact the customer for explanation and supporting information;
- restrict or temporarily suspend outbound service;
- coordinate with the upstream provider regarding mitigation;
- terminate service for persistent or severe violations; and
- cooperate with traceback or law-enforcement requests.

E. Know Your Upstream Provider Procedures

UT&T LLC verifies that its upstream provider relationships are consistent with its robocall mitigation responsibilities. Before using an upstream carrier, and periodically thereafter, UT&T LLC reviews whether the upstream provider is listed in the FCC Robocall Mitigation Database and whether the provider supports traceback cooperation and robocall mitigation obligations.

UT&T LLC currently uses VoIP Innovations / Sangoma Wholesale as a primary upstream provider and verifies that upstream provider status as part of its ongoing compliance process.

The FCC's recent orders specifically identify deficiencies where filers fail to describe know-your-upstream-provider procedures.

III. STIR/SHAKEN Implementation Status

UT&T LLC currently originates traffic through upstream carrier arrangements that include STIR/SHAKEN-related functions performed by an upstream provider. UT&T LLC understands that, under current FCC rules, a provider with a STIR/SHAKEN implementation obligation may not certify to complete or partial implementation based solely on calls being signed with a third party's certificate. UT&T LLC therefore will

IV. Traceback Cooperation

UT&T LLC cooperates with traceback requests from the FCC, law enforcement, and the USTelecom Industry Traceback Group. UT&T LLC will respond promptly to traceback requests and related lawful inquiries and will take appropriate action when evidence indicates suspicious or unlawful traffic.

V. Prior Action / Investigation / Enforcement Status

UT&T LLC has been subject to FCC Robocall Mitigation Database enforcement proceedings relating to deficiencies in its RMD certification and mitigation-plan filing.

Agency involved: Federal Communications Commission, including the Enforcement Bureau and Wireline Competition Bureau.

Nature of action: UT&T LLC was identified by the FCC as having an RMD filing that lacked required information under the FCC's updated robocall mitigation filing requirements.

Relevant procedural history: UT&T LLC appeared in the FCC's December 2024 show-cause process concerning deficient RMD filings, was listed in the FCC's August 25, 2025 removal order, and was later provisionally reinstated subject to further review and correction of deficiencies. In January 2026, FCC staff sent a notification identifying additional deficiencies to be cured.

Current status: UT&T LLC is responding to FCC staff direction to correct remaining deficiencies in its RMD filing.

Summary of issue identified by FCC: The FCC identified deficiencies in UT&T LLC's RMD certification and robocall mitigation plan, including insufficient required information in the filing.

Final determination status: UT&T LLC was removed from the RMD in 2025 and later provisionally reinstated. UT&T LLC understands that failure to cure remaining deficiencies may result in removal from the RMD again.

VI. Refiling / Amendment Request

UT&T LLC respectfully submits this updated robocall mitigation plan and related filing information in order to cure the deficiencies identified by Commission staff and to maintain an accurate and complete filing in the Robocall Mitigation Database.

VII. Declaration

I, Ross Devereaux, certify under penalty of perjury that I am an officer of UT&T LLC, that I am authorized to make this certification on behalf of the company, and that the information contained in this filing and robocall mitigation plan is true, correct, and complete to the best of my knowledge, information, and belief.

Signature: Ross Devereaux

Name: Ross Devereaux

Title: CEO

Date: 3-31-26