

ROBOCALL MITIGATION PLAN (RMP)

UJET, Inc., may be considered a voice service provider within the meaning of the TRACED Act and 47 C.F.R. § 64.6300 of the rules of the Federal Communications Commission. In an abundance of caution, UJET submits this Robocall Mitigation Plan (RMP), which describes UJET's policies and procedures to prevent and mitigate illegal robocalls using North American Numbering Plan (NANP) numbers that pertain to the United States. UJET reserves the right to modify, add, delete, or otherwise alter any of the policies and procedures described in this filing at any time as it deems appropriate to reflect its business, its capabilities, and its needs.

UJET Background

UJET is the world's first and only cloud contact center platform for the smartphone era. By modernizing digital and in-app experiences, UJET unifies the enterprise brand experience across sales, marketing, and support, eliminating the frustration of channel switching between voice, digital, and self-service for consumers. The UJET platform sometimes originates VoIP calls for these purposes, and a good example of this origination involves UJET's software enabling customer care agents to return customer service calls. Due to the nature of its services and carrier relationships, UJET is not a significant source of illegal robocalls.

STIR/SHAKEN Implementation

Paragraph 40 of the FCC's First Call Authentication Report and Order (FCC 20-42) excludes providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN from implementation obligations.¹ Because UJET, Inc. does not own or operate any infrastructure, networks, or facilities, it lacks control over the facilities and network infrastructure necessary to implement STIR/SHAKEN, and it is thus not required to implement STIR/SHAKEN pursuant to paragraph 40. Instead, UJET, Inc. relies on underlying carrier partners to implement and utilize STIR/SHAKEN.

Based on the foregoing, UJET's role in the call chain would be as a voice service provider without a STIR/SHAKEN obligation, if it is considered a voice service provider under the TRACED Act and relevant FCC rules.

Robocall Mitigation Plan

UJET, Inc. (FRN 0031395890) has implemented a Robocall Mitigation Program, as required by Section 4(b)(5)(C) of the TRACED Act, and 47 C.F.R. § 64.6305, as documented below.

This Robocall Mitigation Plan describes the specific measures that UJET has implemented to mitigate and address the risk that it will originate illegal robocall traffic as of December 2024. UJET will periodically evaluate the risks it faces, the effectiveness of its policies and procedures,

¹ See *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97 and 20-67, Report and Order and Further Notice of Proposed Rulemaking, FCC 20-42, 35 FCC Rcd 3241, 3260, para. 40 (2020).

and its capabilities to support the measures described. Should it determine that changes are appropriate, its practices may differ from those described below.

Measures to Prevent or Avoid Exchanging Illegal Robocalls

- **Customer Due Diligence.** UJET requires each customer to complete a detailed “Know Your Customer” questionnaire. Through this questionnaire and its sales order process, UJET collects customer information, including business name, the customer’s service address, a customer employee contact, and billing information. Where necessary, UJET implements an even more detailed “Know Your Customer” process in response to our underlying carriers’ call origination attestation requirements.

Additionally, UJET requires all customers to sign a Master Services Agreement or agree to our Terms of Service and our Acceptable Use Policy, all of which restrict customers’ use of the Services, including by prohibiting unlawful activities such as illegal robocalling.

- **Network Monitoring.** In conjunction with its underlying carriers, UJET will monitor for fraudulent or suspicious traffic, including traffic that may be associated with illegal robocalling activity. In the event potential fraud is detected, UJET will take action to mitigate the potential fraud, including directing its underlying carriers to temporarily or permanently block traffic and undertaking efforts to identify the source of the traffic.
- **Know-Your-Upstream Provider.** As a customer care platform which sometimes relies on carrier partners to route incoming traffic to its customers, UJET takes steps to know its upstream carriers/providers. Specifically, UJET enters into Master Services Agreements with these carriers/providers which allow UJET to collect identifying information on them, including, *inter alia*, their names, addresses and contacts. These Master Services Agreements also contain binding provisions which prohibit unlawful activities such as engaging in or facilitating illegal robocalling.
- **Robocall Analytics and Blocking.** UJET relies on its underlying carrier partners to adopt analytics software for monitoring call traffic and to block relevant calls. UJET itself does not use any call analytics systems to identify and block illegal traffic. Additionally, UJET does not use any third-party analytics vendor(s) for analytics solutions.

To the best of UJET’s knowledge, its underlying carriers identify and block calls from providers that have not filed in the Robocall Mitigation Database. Because such blocking is done at the network level, UJET does not have control over this.

Responding to Traceback Requests

- UJET commits to responding, to the extent permitted under applicable law, to valid traceback requests from the Commission, law enforcement and the Industry Traceback Group (ITG) fully and within 24 hours.

Cooperation with State and Federal Regulators

UJET will cooperate, to the extent permitted under applicable law, with valid requests from the Commission, or law enforcement to identify and stop any illegal robocallers that use UJET services to originate calls. Specifically, consistent with applicable law, UJET will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Robocall Mitigation Compliance Contact

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