

Robocall Mitigation Plan

Business Information

United Technology Group
221 E. Academy
Jennings, LA 70546

Contact for Robocall Mitigation Issues

James Duncan
CTO
(888) 757-1137
jason@duncanworks.com

Overview

In the Commission's release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outlines "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

United Technology Group ("UTG") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. As certified in the FCC's Robocall Mitigation Database, UTG has fully implemented STIR/SHAKEN. In compliance with the R&O, UTG submits this RMP and certification.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51, UTG provides the following information concerning its upstream voice service carrier:

ClearlyIP
3255 W. Highview Drive
Appleton, WI 54914
Tony Lewis
(920) 383-3100
tlewis@clearlyip.com

To the extent that UTG were to receive information from law enforcement or other sources that a customer is engaged in illegal robocalling, our policy is to cooperate fully, including providing the identity of any suspected illegal robocaller, pursuant to legal service or process. While UTG's agreement with its upstream provider contains no provisions specific to robocall mitigation, UTG has received assurances from them that they have, and will continue to, sign calls transmitted to UTG, and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to UTG

Know Your Customers

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with UTG in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

New Subscribers

UTG's KYC program involves obtaining specific subscriber information when onboarding new customers. This process includes collecting such information such as:

- physical business location;
- contact person(s); and
- nature of the customer's business.

Additionally, UTG ensures that all Caller ID's must match customer records and cannot be changed.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by UTG and/or obtained by UTG from UTG's underlying carrier for use by the subscriber. In most cases, UTG directly manages the TNs used by its subscribers. UTG tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of UTG's assignment of the TN to its subscriber.

If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by UTG, then TN validation is necessary. If a subscriber's end-user can provide a valid letter of authorization that they are the authorized user of such TNs, UTG will attest calls originated with these TNs.

When originating a call, UTG checks the calling party number against UTG's inventory and will not attest the call unless the calling party number is a TN that has been properly validated.

Analytics for Monitoring Traffic

UTG works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If UTG detects a calling pattern consistent with illegal robocalls, we will identify the party and take appropriate action. Appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our system.

No third-party vendors are involved in deploying UTG's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, UTG's risk prevention team is alerted which follows the defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

UTG follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, UTG will devote sufficient resources to provide prompt and complete resources to traceback requests. **UTG certifies that it will comply with traceback requests within 24 hours of receiving same.**

UTG will investigate suspicious activity found by its monitoring system or reported to UTG by subscribers or third parties. The investigation could potentially result in opening a traceback request or with UTG contacting a subscriber to correct improper use of the platform, or, if the subscriber does not respond or comply, to block their use of the platform.

Blocking

UTG will implement Do Not Originate requests it receives from the ITG. UTG has mechanisms to automatically block suspicious calls using internal analytics. If UTG's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, UTG will take appropriate action which may include suspending or terminating the subscriber's use of UTG's network. UTG will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including state attorneys general offices), the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. UTG will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, UTG will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Jason Duncan

I, Jason Duncan, Chief Technology Officer of United Technology Group ("UTG") do hereby certify, under penalty of perjury, the following:

- a. UTG has fully implemented STIR/SHAKEN in the IP portions of its network.
- b. UTG's business name and primary address are as follows:

United Technology Group
221 E. Academy
Jennings, LA 70546
- c. UTG has no other business names in use.
UTG has not previously used any other business name.
- d. The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- e. UTG's owners are as follows: Jason Duncan, Ryan Stockwell, Tom Stockwell.
- f. UTG's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- g. UTG has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- h. UTG has not subject been to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- i. UTG's Operator Code Number is 473K.

Jason Duncan

Jason Duncan