



Robocall Mitigation Plan

We have not been prohibited from filing a certification in the Robocall Mitigation Database.

Universal Telcom, LLC, nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

We use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN Extensions

Our network does not have the capability to implement STIR/SHAKEN and we rely on our carrier partner (Bandwidth.com)(RMD0003709) to sign our calls. Bandwidth provides TNs to our customers and is fully compliant with STIR/SHAKEN, therefore they certify our customer originations.

All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

We use software provided by Bandwidth.com to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls.

Combining behavioral analytics, caller authentication and verification, our solution features:

- ☐ **Fraud Detection:** Detection of high volume robocalling, spoofing and spam call activity.
- ☐ **Subscriber Notification:** Caller ID Name override to warn subscribers of suspicious calls.
- ☐ **Call Blocking Support:** Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)
- ☐ **Business Number Verification:** Register legitimate business numbers to prevent unintentional call blocking.
- ☐ **Caller ID Name Service:** Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.

In addition, we have implemented a Call Abuse Policy and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

*“Any call originated on the Universal TelCom, LLC network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the **Universal TelCom, LLC** network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”*