

ROBOCALL MITIGATION PLAN

Company Name: Universal E-Business Solutions, LLC

FCC FRN: 0021463633

Business Address: 70 Adams Street 3rd Floor, Hoboken, New Jersey, 07030

Primary Contact (Robocall Compliance Officer): Deepak Muthereja, 6467064019

Contact Email: support@uebiz.com

1. Purpose and Company Overview

This Robocall Mitigation Plan is submitted by Universal E-Business Solutions, LLC's ("Company") in compliance with 47 CFR § 64.6305 and is filed with the FCC Robocall Mitigation Database.

Universal E-Business Solutions, LLC is a non-facilities-based reseller of VoIP-based business telephone services to a limited number of vetted business customers. The Company does not own or operate telecommunications network infrastructure, does not directly interconnect with the Public Switched Telephone Network (PSTN), and does not provide voice services to residential consumers or the general public. All voice traffic is routed exclusively through the Company's upstream carrier. The Company serves a small, known base of business customers for whom it also provides managed IT and technology services, which means customer activity is continuously observable and auditable.

This Plan describes the specific reasonable steps the Company takes to prevent, detect, and respond to unlawful robocall traffic in accordance with Commission rules.

2. STIR/SHAKEN Implementation Status

Universal E-Business Solutions, LLC is a non-facilities-based reseller that does not own or control the underlying network infrastructure necessary to implement STIR/SHAKEN. Pursuant to 47 C.F.R. § 64.6305(d)(2)(i), the Company is therefore unable to fulfill this implementation obligation. The Company's upstream carrier performs all STIR/SHAKEN authentication on the Company's behalf. Accordingly, the Company's call chain role is that of a Voice Service Provider without a STIR/SHAKEN obligation

3. Know Your Customer (KYC)

Universal E-Business Solutions, LLC maintains formal Know Your Customer procedures in accordance with 47 C.F.R. § 64.1200(n)(4). Prior to activating voice services for any customer, the Company:

- Verifies legal business identity through corporate registration documents, Secretary of State records, or comparable business registration sources
- Collects and reviews EIN or tax identification information
- Confirms the customer's physical address and primary contact information
- Reviews the customer's intended use of voice services and expected calling profile

- Executes contractual agreements that explicitly prohibit unlawful robocalls, spoofing, falsified caller ID, and use of services in violation of TCPA, TSR, and applicable FCC rules
- Rejects customers with unverifiable identity, prior regulatory issues, or suspicious business models

The Company does not activate service until its onboarding review is complete. Because the Company also serves as its customers' managed IT provider, customer activity and service usage are continuously observable and auditable throughout the customer relationship.

4. Know Your Upstream Provider

Universal E-Business Solutions, LLC transmits all voice traffic through its upstream carrier, Twilio Inc., which maintains an active certification in the FCC Robocall Mitigation Database. The Company has verified that Twilio is a registered voice service provider with full STIR/SHAKEN implementation and an active robocall mitigation program.

The Company would take immediate corrective action, including seeking an alternative provider, if the upstream carrier's RMD certification were removed or found deficient.

The Company does not use any third-party analytics vendors directly. Traffic analytics and fraud detection are performed by the upstream carrier, Twilio, whose robocall mitigation program is on file with the FCC Robocall Mitigation Database.

5. Call Analytics and Traffic Monitoring

Universal E-Business Solutions, LLC monitors outbound calling activity through review of Call Detail Records (CDRs) for indicators of abnormal or suspicious behavior, including:

- Unexpected spikes in call volume per customer account
- High numbers of short-duration calls
- Unusual time-of-day or destination patterns inconsistent with the customer's expected business use
- Repetitive calling to the same destination in a short time window

The Company does not currently employ a separate third-party call analytics vendor. The Company relies on a combination of internal CDR review and the robocall analytics and blocking implemented by its upstream carrier, Twilio. To the extent analytics are provided by an upstream provider rather than the Company directly, the Company identifies that upstream provider here as required by FCC guidance. When suspicious activity is detected, the Company investigates promptly and takes appropriate action as described in Section 6 below.

6. Enforcement and Escalation

When suspicious or unlawful traffic is identified, Universal E-Business Solutions, LLC takes the following escalating actions:

- Step 1: Warning issued and traffic investigation initiated
- Step 2: Suspension of service pending remediation
- Step 3: Permanent termination of service for confirmed violations

All enforcement actions are documented and retained as part of the Company's compliance records.

7. Traceback Cooperation

Universal E-Business Solutions, LLC commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperating with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. The Company retains call records for a minimum of 180 days to support traceback and compliance investigations. A designated compliance contact is available to respond to traceback requests.

8. Prior FCC Enforcement Actions

Universal E-Business Solutions, LLC has been the subject of FCC Robocall Mitigation Database enforcement proceedings. Full descriptions of these actions, including agencies involved, dates, current status, findings, and final determinations, are provided in the Company's RMD certification filing in accordance with 47 C.F.R. § 64.6305(d)(2)(iv).

9. Compliance Oversight and Plan Updates

Deepak Muthereja serves as the Company's Robocall Compliance Officer and oversees implementation and enforcement of this Plan. The Company conducts quarterly internal reviews of customer accounts and traffic patterns to evaluate the effectiveness of its robocall mitigation practices.

This Plan will be reviewed and updated as needed to reflect changes in FCC rules, industry best practices, or the Company's upstream carrier relationships. The Company will update its RMD filing within 10 business days of any material change to this Plan or to the information required under 47 C.F.R. § 64.6305(d).

10. Certification

I, Anu Manocha, of Universal E-Business Solutions, LLC, certify under penalty of perjury that I am authorized to make this certification on behalf of the Company, and that the information contained in this Robocall Mitigation Plan is true, correct, and complete to the best of my knowledge, information, and belief, in conformity with 47 CFR § 1.16.

Name: Anu Manocha

Title: CEO

Date: 04/20/2026