



Robocall Mitigation Plan

Unitel Inc. resells service using several Underlying Carriers (“Partners”), as listed below, and relies on their commitment and processes to combat Robocalls. **Unitel Inc.** has no access to the SIP trunks provided from the Partners to our SIP PBX customers and therefore has no ability to monitor and detect calling patterns. Our Partners provide DIDs directly to our SIP PBX customers.

a. PayG. DbA Skyswitch (RMD0002940) Complete STIR/SHAKEN Implementation Robocall Mitigation Plan filed

b. CoreDial (RMD0002771) Complete STIR/SHAKEN Implementation

1. **Unitel Inc.** commits to respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities, and its Partners, in investigating and stopping any illegal robocallers from using its services to originate calls, and that all voice traffic that originates on its network is subject to this robocall mitigation program.

2. **Unitel Inc.** screens all applicants for its services to determine if they are intending to use such services for autodialing from a database of numbers for purposes of telemarketing without having received written permission from the called parties. Calls to wireline numbers for purposes of political campaigning, market research or polling are deemed legal.

3. **Unitel Inc.** commits, by contract with its Partners, that all users of its services comply with applicable laws prohibiting illegal robocalling and providing for blocking and/or termination of services for those that breach such provisions.

4. **Unitel Inc.** relies on its Partners commitment to continuously monitor calling patterns in and out of network to identify fraudulent traffic, including robocalling, traffic pumping, and international toll fraud. **Unitel Inc.** will block services to a customer if it determines that the customer is using the services for any illegal activities, including robocalling. Such customer agreements will be terminated if the violation is determined to be intentional.

5. STIR/SHAKEN IMPLEMENTATION EXTENSION

Unitel Inc. does not have the capability to deploy STIR/SHAKEN as we are a reseller of hosted VoIP platforms provided by the above listed Partners and therefore is not subject to the Commission's rules for implementation. Our Partners bear responsibility for implementation in the IP portions of their network within the time set under the Commission's rules consistent with 47 CFR § 64.6301(a). Given **Unitel Inc.'s** status as a reseller, it is not subject to the Commission's extension.

Unitel Inc. has contracted with its voice provider Partners to attest, at the applicable levels, its customers' traffic originated on **Unitel Inc.'s** network.

All voice traffic that originates on the Company's network is subject to the robocall mitigation plan described above.