



Union Street Media – Robocall Mitigation Plan

Date: April 1, 2026

Company: Union Street Media, Inc.

FCC Registration Number (FRN): 0032514416

Contact Email / Phone: Edward F Adler

1. Company Overview

Union Street Media provides digital marketing and website solutions for real estate brokerages and agents.

Our platform integrates call tracking, virtual numbers, and agent notifications to help clients measure lead attribution and connect directly with consumers.

2. Outbound Call Use Cases

Union Street Media does not originate or permit any mass robocalls.

Outbound voice traffic through our systems is limited, controlled, and business-driven:

- Call forwarding for lead attribution: When a consumer calls a tracked number, we forward the call to the relevant real estate agent or office.
- Transactional notifications: Occasionally used for agent-related updates directly initiated by clients.
- No marketing robocalls: We do not originate automated marketing calls, cold-calling campaigns, or dialer-based lead generation.

3. Robocall Mitigation Measures

3.1 Controlled Number Assignment

- All virtual numbers are assigned directly to known clients.
- No anonymous or public programmatic provisioning of numbers is permitted.

3.2 Limited Call Volume

- Outbound call traffic per number is low-volume and transactional.



- No automated sequential dialing or bulk call generation occurs.

3.4 Client Compliance Requirements

- All clients agree to the Terms of Use, which prohibit the use of our platform for illegal robocalls or unsolicited telemarketing.
- Violation leads to immediate suspension of services and number reclamation.

4. STIR/SHAKEN Status

- Union Street Media submitted as except from STIR/SHAKEN because it lacks control over its systems or infrastructure. It currently relies on Bandwidth as an upstream carrier.
- Bandwidth signs calls under STIR/SHAKEN where possible.
- Mitigation measures apply to all calls

5. Enforcement and Response

If Union Street Media receives complaints, traceback requests, or FCC notices, we:

1. Investigate immediately (within 24 hours).
2. Suspend outbound capabilities if abuse is confirmed.
3. Cooperate fully with carriers, traceback consortia, and regulators.

6. Certification

I certify that Union Street Media has implemented the above measures to prevent and mitigate illegal robocalls to the maximum extent possible, given the current infrastructure.

Edward F Adler
Founder & President



Union Street Media – Know Your Customer (KYC) Plan

Company: Union Street Media, Inc.

FRN: 0032514416

Upstream Carrier: Bandwidth

1. KYC Program Overview

Union Street Media maintains a Know Your Customer (KYC) program designed to prevent, detect, and mitigate illegal robocall traffic. The program applies to all new and existing customers using voice-enabled services and is reviewed on an ongoing basis.

2. Customer Identification and Verification

New Customers:

Before provisioning any telephone numbers or voice functionality, Union Street Media collects and reviews:

- Legal business name and physical address
- Business website and domain
- Authorized contact and role
- Intended use of voice services

Union Street Media serves established real estate brokerages and agents only and does not provide voice services to anonymous users, lead brokers, or telemarketing entities. Telephone numbers are not provisioned through self-service or automated systems.

Existing Customers:

Existing customers are subject to the same KYC standards. Union Street Media relies on:

- Contractual and billing records
- Ongoing account management relationships
- Continued verification of active real estate operations

Material changes to ownership, business purpose, or call usage trigger re-review under this KYC program.

3. Third-Party Analytics and Monitoring

Union Street Media uses Bandwidth, its upstream carrier, for all call routing, all call detail records, all call analytics, and STIR/SHAKEN signing where available. Bandwidth provides call-level data and carrier signaling



used to identify abnormal or suspicious traffic patterns. Union Street Media does not permit downstream resale or third-party dialing platforms.

4. Traffic Controls and Mitigation Measures

Union Street Media implements the following reasonable mitigation steps:

- Voice use limited to call forwarding of inbound consumer calls and transactional, client-initiated communications
- Low call volumes inconsistent with mass or automated robocalling
- No predictive dialers, prerecorded messages, or bulk outbound campaigns
- Manual assignment of all numbers to known customers and destinations
- Periodic internal review of call activity

5. Prohibited Use and Enforcement

Union Street Media's Terms of Use prohibit illegal robocalls, unsolicited telemarketing, caller ID spoofing, and lead resale. Upon identification of potential abuse, Union Street Media will investigate within 24 hours, suspend outbound capabilities if warranted, reclaim numbers, and cooperate with Bandwidth, traceback requests, and regulators.

6. Certification

I certify that this KYC plan is actively implemented and applied to all customers to mitigate illegal robocall traffic to the maximum extent possible given its infrastructure and business model.

Edward F Adler

Founder & President



June 8, 2022 - After receiving notification from the FCC regarding a missing FRN registration, FRN registration was submitted by Brad Young, our Director of Client Services. Brad was the designated point of contact for FCC communications based on that filing. Brad's email address was the only one on file with the FCC establishing a single point of failure from the beginning of our relationship with the FCC.

How rectified (as of Fall 2025): We have created a new email address, calltracking@unionstmedia.com, which goes to multiple stakeholders at Union Street Media to prevent the issue of a single point of contact failure.

Action Taken by the FCC: Bandwidth sent notification about Robocall Mitigation Database subscription requirements.

Date: December 2023

Union Street Media actions: The Bandwidth notification was forwarded internally and discussed in a leadership meeting. The team didn't understand this was a compliance obligation requiring action from us. We looked for records of prior submissions and couldn't locate documentation showing what had been filed with the FCC.

Action Taken by the FCC: Received a failure to comply notice from the FCC

Date: February 2024

Union Street Media actions: Bandwidth notification warning that service would be stopped due to non-compliance. This was the first indication that we had an active compliance requirement. We investigated and created the compliance roadmap document at that point. Our engineering team missed that there was a February 26, 2024 deadline for updating RMD filings until reviewing the recent FCC correspondence

Action Taken by the FCC: Brad Young received a notification from the Enforcement Bureau.

Date: Dec 17 2024, 6:47 pm.

RMD Order: 24-1267

The current status: Unresolved.

Union Street Media actions: Brad Young received a notification from the FCC Enforcement Bureau. He did not recognise that this was from FCC and forwarded to our engineering Support team for investigation. Support checked with Heather Hinman, our Director of Operations, and closed the ticket with no known resolution.

Here is a copy of the communication from the FCC on December 17, 2024 and which includes a summary of the action's findings



----- Forwarded message -----

From: **EnforcementBureauTCD** <EnforcementBureauTCD@fcc.gov>

Date: Tue, Dec 17, 2024 at 5:41 PM

Subject: Official Correspondence, Federal Communications Commission - Public Notice

To: EnforcementBureauTCD <EnforcementBureauTCD@fcc.gov>

Dear Robocall Mitigation Database Filer:

Please find attached a Public Notice released by the Enforcement Bureau (Bureau) of the Federal Communications Commission announcing that a summary of the Bureau's Order pertaining to deficiencies in your Robocall Mitigation Database certification has been published in the Federal Register.

Sincerely,

Jessy Kinsey

Attorney Advisor

Telecommunications Consumers Division

Enforcement Bureau

Federal Communications Commission

(202) 418-1305



DA-24-1267A1.pdf



This is what appeared in the attached file and shows the reference to Union Street Media



PUBLIC NOTICE

Federal Communications Commission
45 L Street NE
Washington, DC 20554

News Media Information 202-418-0500
Internet: www.fcc.gov
TTY: 888-835-5322

DA 24-1267

Released: December 17, 2024

THE ENFORCEMENT BUREAU ORDERS 2,411 VOICE SERVICE PROVIDERS TO SHOW CAUSE BY DECEMBER 31, 2024 WHY THEY SHOULD NOT BE REMOVED FROM THE ROBOCALL MITIGATION DATABASE

By this Public Notice, the Enforcement Bureau (Bureau) announces that on December 17, 2024 a summary of the Bureau's order (Order) directing 2,411 voice service providers and gateway providers (each, a Company; collectively, the Companies) to show cause why they should not be removed from the Robocall Mitigation Database (RMD) was published in the Federal Register.¹ **Each Company** named in Appendix A to the Order **must file its response by December 31, 2024.**² Each Company³ must cure the deficiencies in its RMD certification and notify the Bureau that the deficiencies have been cured or file a response explaining why the Bureau should not remove the Company's certification from the RMD.⁴ If any Company fails to cure the deficiency or provide a sufficient explanation why its certification is not deficient by the deadline, the Bureau will release an order removing the Company's certification from the RMD.⁵ Removal from the RMD would require all intermediate providers and voice service providers to stop accepting all traffic directly from the Company.⁶

Background. The Commission required all voice service providers to provide compliant certifications in the RMD pursuant to rules that took effect on February 26, 2024.⁷ On March 29, 2024, the Wireline Competition Bureau notified each Company that its certification was not in compliance with the new rules.⁸ The Companies were given until April 29, 2024, to come into compliance or face removal from the RMD.⁹ Each Company failed to update its certification and was referred to the Bureau which

¹ 2,411 Robocall Mitigation Database Filers, Order, DA 24-1235, 2024 WL 5090088, at *1 (OHMSV Dec. 10, 2024) (Appendix A to the Order identifies each of the Companies by name), <https://docs.fcc.gov/public/attachments/DA-24-1235A1.pdf>.

² *Id.*; *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Red 2573, 2604, para. 60 (2023) (*Sixth Caller ID Authentication Order*).

³ See Attachment A.

⁴ *Sixth Caller ID Authentication Order*, 38 FCC Red at 2604, para. 60.

⁵ *Id.*

⁶ 47 CFR § 64.6305(g)(1), (3).

⁷ See *Wireline Competition Bureau Announces Robocall Mitigation Database Filing Deadlines and Instructions and Additional Compliance Dates*, WC Docket No. 17-97, Public Notice, 39 FCC Red 383, 383-87 (WCB 2024); Fed. Comm'n's Comm'n, *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, 89 Fed. Reg. 4833, 4833 (Jan. 25, 2024) (establishing February 26, 2024 as the effective date for the amendments to section 64.6305).

⁸ E-mail from Robocall Mitigation Database Team (Mar. 29, 2024) (on file in EB-TCD-24-00036891).

⁹ *Id.*

initiated removal proceedings against the Companies with the release of the Order on December 10, 2024.¹⁰ The Order gave each Company 14 calendar days from the publication of a summary of the Order in the Federal Register to submit a written response to the Bureau that either informs the Bureau that the Company has updated its RMD certification to correct the deficiency or explains why its certification should not be removed from the RMD.¹¹ The summary of the Order was published in the Federal Register on December 17, 2024. Copies of the order were also emailed to the robocall mitigation contact identified in each Company's RMD certification.

Consequences for failure to respond. If any Company fails either to cure the deficiencies in its certification and notify the Bureau that it has cured, or to adequately explain why it should not be removed from the RMD by December 31, 2024, the Bureau will release an order removing the Company from the RMD.¹² Once the Bureau removes a Company's certification from the RMD, all voice service providers and intermediate providers will be required to cease accepting calls directly from that Company.¹³

For further information, please contact the Enforcement Bureau at EnforcementBureauTCD@fcc.gov or (202) 418-7433.

– FCC –

¹⁰ 2,411 Robocall Mitigation Database Filers, Order, DA 24-1235, 2024 WL 5090088, at *2, para. 5 (OHMSV Dec. 10, 2024).

¹¹ *Id.* at *4, para. 10.

¹² *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

¹³ 47 CFR § 64.6305(g)(1), (3).



Union Street Media

Federal Communications Commission

DA 24-1267

RMD File No.	Business Name
RMD0009622	Ulmer Enterprises, Inc.
RMD0008908	Ulrich Barn Builders
RMD0005298	Ultimate Internet Access, Inc
RMD0009037	Unbound Systems LLC
RMD0015458	Uniccdialer LLC
RMD0011591	Unicorn Communication Inc
RMD0007402	UNIDES, Inc.
RMD0015323	Unified Data Services
RMD0005641	Unified Dispatch LLC
RMD0006779	Unified Telecom Inc
RMD0011497	Unified Telecommunication Solutions, LLC
RMD0003810	Unified Voice Communication LLC
RMD0013013	UNIFIED VOICOM MANAGEMENT LLC
RMD0007581	Unintended-Consequences. LLC
RMD0011394	Union Street Media
RMD0005921	UNIQUE SOFT LLC

Action Taken by FCC: Bandwidth removal orders issued (August 26, 2025) which were communicated to us via Bandwidth, not the FCC

Date: August 2025



[View in a browser](#)



We have important news to share with you

Dear Union Street Media, Inc.,

This is notice of the removal of US termination (outbound voice) services from your account **effective August 27, 2025**, pursuant to the Federal Communications Commission's ("FCC") [Order](#) (DA 25-737) released on August 25, 2025 ("Order"). Bandwidth, as an intermediate provider, has an obligation to comply with the terms of this Order. Accordingly, if you have US outbound/termination services with Bandwidth, Bandwidth will be taking action to remove these services to comply with the Order.

The Order removes your company from the FCC's [Robocall Mitigation Database](#). As noted in the Order, under FCC rules, "*[r]emoval of a Company's certification from the RMD requires all intermediate providers and voice service providers to cease accepting all calls directly from the Company.*" See Order para. 1. Furthermore, the Order requires that intermediate and voice service providers cease taking calls from providers listed within "two business days" of the Order's release date (i.e., August 27, 2025). See Order at para. 8.

If you have any questions or concerns, please direct them to the FCC's Wireline Competition Bureau and Enforcement Bureau. See Order para. 8.

This Notice is without prejudice to any of Bandwidth's rights, powers, privileges, remedies, and defenses, now existing or hereafter arising, all of which are hereby expressly reserved.

Capitalized terms not otherwise defined in this Notice will be as defined in the applicable Services Agreement, the Order Form, and/or any applicable Product Terms or Supplemental Terms. All terms and conditions of the Services Agreement, the Order Form, Product Terms, Supplemental Terms, and/or other documents referenced and/or incorporated in the Services Agreement, not otherwise modified in this notice, will remain unchanged and in full force and effect.



Union Street Media actions: We removed our Bandwidth call tracking application from all of our clients websites. We commenced an internal investigation into how we got to the point of the removal order and what steps were needed to comply with the FCC's requests. In late September, 2025 we reached out to the FCC (around the time of the Federal Government shut down) to address our non-compliance and share how we had changed our internal process to ensure future compliance.

Status: Unresolved. Waiting on FCC approval to resurrect call tracking on our clients sites.