

## **Robocall Mitigation Plan**

### **UComtel Inc**

#### Company Information

UComtel Inc  
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Operating Company Number: 534J

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#### Overview

UComtel is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

The company is committed to prevent illegal robocall from originating on its network.

UComtel has many upstream providers including Sinch, Peerless, and others.

Below is the Robocall Mitigation Plan that Ucomtel has implemented to comply with the FCC's rules.

#### STIR/SHAKEN

Ucomtel Inc has fully implemented the STIR/SHAKEN requirements in accordance with all related FCC parameters and guidelines and pursuant to all current FCC Orders.

As referenced above, Ucomtel has its own OCN number.

Ucomtel Inc has established relationships with companies like Neustar and Telonium. These companies have assisted in the deployment of the STIR/SHAKEN program.

#### Know Your Customer

New customers must provide a legal entity name, valid US address, working US telephone number, and email address.

They must also provide the type of traffic that will be originating from their voice equipment.

The company then verifies the data and only activates service if all information provided is valid.

Verification process:

- Check company name and address with the secretary of state

- Verify main number against publicly accessible data
- Validate services ordered to industry standards

### Traceback

We respond 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.

Traceback requests will be responded to within 24 hours.

### Suspicious Activity

UComtel analyzes traffic for illegal robocalling.

This analysis includes:

- Individual customer call activity compared to the expected trends across our customer base.
- Unusual increases in voice traffic. This includes both the simultaneous number of calls as well as the total number of calls in a given period.

### Blocking

Ucomtel Inc will promptly respond to Do Not Originate requests it receives from the ITG and has mechanisms to block suspicious calls using internal analytics.

If the Company's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, it will take appropriate action which typically include suspending or terminating the subscriber's use of services.

### RND & Updates

UComtel is registered with the FCC Reassigned Number Database.

Updates are submitted monthly.

### Plan Updates

This Plan will be submitted to the FCC's Robocall Mitigation Database and will be adapted to adjust to the latest laws, regulations, and industry best practices.

UComtel Inc will update this Plan within ten (10) business days following the date of any changes to the Plan.

#### Terms of Use/Acceptable Use Policies

UComtel Inc terms of service for voice products prohibits use of the service for unlawful purposes.

It permits UComtel Inc to monitor use of the service for compliance and allows for termination of the service at UComtel Inc discretion.