

UNIVERSAL CALL LIMITED Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by UNIVERSAL CALL LIMITED (“UNIVERSAL CALL”) to mitigate and eliminate illegal robocalling. UNIVERSAL CALL has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

UNIVERSAL CALL is a VoIP wholesale, carrier to carrier service provider who provides telecom services on a resale-only basis. As a telecom reseller, UNIVERSAL CALL is dependent on our underlying provider’s assistance with monitoring their networks for fraudulent voice calling patterns. Currently UNIVERSAL CALL only provides international to international wholesale VoIP carrier to carrier telecom services but will modify this filing in case the service offerings change to include either calls that originate or terminate in the US.

Know Your Underlying Provider

UNIVERSAL CALL LIMITED has master service agreements with our upstream providers and has received written assurances from their officials that it has and will continue to sign calls submitted to UNIVERSAL CALL LIMITED and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to UNIVERSAL CALL. UNIVERSAL CALL and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes.

In our research of the prospect, UNIVERSAL CALL will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to UNIVERSAL CALL’s strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with UNIVERSAL CALL.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by UNIVERSAL CALL as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

UNIVERSAL CALL is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls.

UNIVERSAL CALL will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Adnan Jamil
Managing Director
Adnan@unicalltd.com
+44-207-096-9097

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer.

If the fraudulent traffic is not remediated, UNIVERSAL CALL immediately begins rejecting all traffic from the offending customer.

International Calling

UNIVERSAL CALL is currently an international voice services provider with no nexus in the US. If at any time UNIVERSAL CALL does decide to sell US originating or terminating services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a reseller, UNIVERSAL CALL must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

When UNIVERSAL CALL receives notifications from our carriers, we investigate the incident, and if confirmed, we shut down the traffic.

UNIVERSAL CALL Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

Adnan Jamil
Managing Director
6-9 THE SQUARE, STOCKLEY PARK
LONDON UB11 1FW, UNITED KINGDOM
Adnan@unicalltd.com
+44-207-096-9097