

## **ROBOCALL MITIGATION PLAN**

UBT EU Ltd  
The Precinct  
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### **Summary**

The Federal Communications Commission requires all voice service providers to file robocall mitigation plans and detail the reasonable steps they take in order to mitigate/protect against robocalls. The FCC requires voice service providers to implement STIR/SHAKEN and those who lack control over network infrastructure necessary to implement STIR/SHAKEN to have taken “reasonable steps” to mitigate illegal robocalls.

This plan details the practices UBT has in place to significantly reduce the carrying, processing or origination of illegal robocalls

### **UBT Role as a pure Reseller**

UBT is a reseller of voice services and as such does not have control over the network infrastructure in order to implement STIR/SHAKEN. UBT works with upstream provider Bandwidth to provide the network infrastructure. UBT has a reseller agreement with Bandwidth.

### **Details of network infrastructure provider**

The details of the network infrastructure used by UBT as the upstream provider are:

Bandwidth Inc (d/b/a Voxbone)

900 Main Campus Drive

Suite 100

Raleigh NC 27606

Stephen Thayer

[voicesecurity@bandwidth.com](mailto:voicesecurity@bandwidth.com)

or

Alex Martin

+44 7951 560873

### **Network Infrastructure Confirmation of STIR/SHAKEN compliance**

UBT has written confirmation from Bandwidth that it confirms with STIR/SHAKEN and Bandwidth has provided written details of its compliance plan to UBT. Bandwidth confirmed in writing that it takes aggressive steps to prevent illegal traffic from entering its network and is an active petitioner

with the FCC. Bandwidth's STIR/SHAKEN plan is registered under RDM0003702 and FCC registered number 0031092331

### **Reasonable Steps Plan**

As part of the FCC's requirement of evidence of reasonable steps taken to mitigate robocalls UBT confirms it has the following in place:

#### *Know your customer*

UBT is part of the Plymouth Brethren Christian Community and mainly limits its services to community members. Accordingly UBT resells mainly to customers within the Plymouth Brethren Community meaning it generally has a close understanding of its customers. In addition, UBT undertakes the following due diligence on all its customers, whether within the Plymouth Brethren Community or in the wider general business community:

- Credit check
- Name and address verification

#### *Contractual Terms and Acceptable User Policy*

UBT has specific terms and conditions governing the reselling of voice services to its customers and the terms detail comprehensive prohibited activities including:

- Prohibition of using the services for illegal or fraudulent activity
- Send unsolicited commercial messages in any form
- Falsify user information

UBT has the right to terminate or suspend services if it finds the end user/customer violates any terms or undertakes fraudulent activities.

#### *Protection during service*

UBT does not support or allow Robocall Automated Dialler systems to be connected to the phone systems that UBT support's, UBT uses carriers that, as far as UBT is aware, are fully compliant with relevant regulations in any country that UBT provides service.

UBT has implemented a fraud alert service for its end users/customers to assist with the prevention of fraud whereby our providers will alert us of any abnormal activities and UBT will act on those alerts quickly.

Our provider for USA Originated calls is Bandwidth who has the STIR/SHAKEN plan in place as detailed above. In addition UBT has procedures in place to alert us of abnormal usage activity .

Further steps UBT takes to protect against Robocalls on its worldwide services include the following: UBT uses Voiceflex as its primary UK Provider. Voiceflex are registered with the FCC and have a rigid fraud monitoring system which will automatically shut down a service if it detects any abnormal activity.

#### *Traceback*

UBT complies with any information requests from authorities in a swift fashion and will do our utmost to cooperate with any entity investigating Robocall traffic.