

ULTATEL, LLC

Robocall Mitigation Plan

February, 2024

Introduction

This document details the steps taken by ULTATEL, LLC (“ULTATEL” or “Company”) to avoid originating illegal robocalling.

ULTATEL providers resold interconnected VoIP services to only business customers. ULTATEL does not own or control facilities that would enable it to implement the STIR/SHAKEN authentication framework, but relies on its underlying carrier, Bandwidth Inc, to authenticate all calls originating from its customers. The RMD registrations for the underlying carrier indicate that it has fully implemented STIR/SHAKEN across their network. Accordingly, ULTATEL has also registered as having Complete STIR/SHAKEN implementation because all calls it originates are compliant with §64.6301(a)(1) and (2). ULTATEL verifies any other upstream provider they may resell to ensure that they are registered as Complete STIR/SHAKEN implementation in the RMD and confirms that the provider will appropriately authenticate calls originating from or terminating to ULTATEL’s customers.

Traceback

ULTATEL 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 will cooperate with these agencies to investigate and stop any illegal robocallers that use its service to originate calls. ULATTEL has a 24/7 compliance and fraud monitoring team that responds to all urgent requests. In case of a traceback request, our team has full access to all subscribers CDRs and can detect patterns consistent with robocalling and immediately close all traffic from the entire offending subscriber.

Know your Customer

ULTATEL is engaged in a business-to-business sales model and screens all new business customers. All of our customers have corporate offices in the United States and Each customer must nominate a company representative, which can be externally verified. Existing numbers are ported into Bandwidth.com which have its own internal robocall mitigation processes and protocols.

All Active ULATATEL Customers have access to tools for call screening and can block calls by using CallerID details.

ULTATEL periodically reviews Call Detail Records for suspicious behavior and patterns that are indicative of robocalls that are in violation of our Acceptance use policy available at <https://www.ultatel.com/aup>

ULTATEL reserves the right to terminate service of any Customer for any violations, including but not limited to unlawful Robocalls.

ULTATEL uses varies processes and analytics to identify illegal robocalling including:

- Monitoring the network to identify suspicious traffic patterns.

- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.