

Unity Carrier Robocall Mitigation Plan

Unity Carrier is committed to preventing the origination of illegal robocalls and is taking a multi-faceted approach to achieve this goal. The company's plan includes the following key components:

1. Clear Contract Provisions

Unity Carrier ensures that its contracts with customers are clear about the types of traffic that it will and will not accept. The company has strict rules in place for non-compliance and will terminate contracts for any violations. Furthermore, Unity Carrier reserves the right to share information about violators with enforcers and industry partners.

2. Customer Vetting

Unity Carrier conducts thorough vetting of new commercial customers to confirm their identity and ensure they are legitimate businesses. The company collects information such as the physical business location, contact persons, state or country of incorporation, federal tax ID (if applicable), and the nature of the customer's business. This vetting process helps Unity Carrier to identify and exclude suspicious or anonymous accounts.

3. Monitoring and Rapid Response

Unity Carrier has a robust monitoring system in place to detect suspicious activity and takes prompt and decisive action when necessary. If the company receives a traceback notice for an illegal robocall, it does not ignore the issue and instead insists on specific, deterministic explanations and explicit corrective actions from its customers. Repeat offenders or customers with lax controls will not be tolerated.

4. Communication and Documentation

Unity Carrier communicates policies on illegal robocalls to its customers and maintains a record of these notifications. This helps to ensure that customers are aware of the company's stance on robocalls and its intolerance of illegal activity.

5. Foreign Sources

Unity Carrier is especially cautious when dealing with foreign sources that send auto-dialed traffic using USA +1 telephone numbers. The company takes extra steps to verify the legitimacy of these sources to prevent the origination of illegal robocalls.

6. Robocall Mitigation Database

Beginning in August of 2024, Unity Carrier will ensure that all customers have registered with the Robocall Mitigation Database. This will help to prevent illegal robocalls from being originated by ensuring that only legitimate businesses are able to send traffic.

7. Call Blocking

Unity Carrier performs call blocking to specified phone numbers as a robocall mitigation measure. This helps to prevent robocalls from reaching the intended recipients and reduces the overall volume of robocalls.

8. Cooperation with Investigative Bodies

Unity Carrier cooperates with investigative bodies and stands ready to comply with traceback requests from law enforcement, the FCC, or the Industry Traceback Group, the official consortium designated to lead private traceback efforts. The company has designated a single point of contact to handle traceback requests and coordinate with outside investigations.

Overall, Unity Carrier's robocall mitigation plan is comprehensive and addresses various aspects of robocall prevention. The company's efforts to verify its customers, monitor for suspicious activity, and cooperate with investigative bodies—in addition to ensuring that all customers are registered with the Robocall Mitigation Database and implementing call blocking measures—will help to mitigate robocalls.