

UponAI, LLC
ROBOCALL MITIGATION PLAN

UponAI, LLC is committed to cooperating with the Federal Communications Commission (FCC) in preventing and mitigating illegal robocalls. This statement describes the measures the Company has implemented to comply with applicable FCC robocall mitigation requirements.

UponAI, LLC is a non-facilities-based reseller / white-label provider. The Company does not originate traffic directly to the PSTN and relies exclusively on underlying U.S.-based facilities-based carriers for call transmission.

In compliance with 47 CFR §64.6305, **UponAI, LLC** maintains a robocall mitigation program reasonably designed to prevent unlawful robocalls. The program includes customer due diligence procedures, monitoring of traffic patterns, prompt response to traceback requests, and suspension or termination of customers engaged in illegal robocalling.

Know Your Customer (KYC)

The Company follows a structured onboarding process to verify the identity and legitimacy of its customers. This process includes background screening, credit review, business verification, and manual validation procedures prior to activating service.

Traceback Cooperation

The Company commits to fully cooperating with the FCC, authorized traceback consortiums, and law enforcement agencies. The Company responds to all traceback requests within 24 hours and takes appropriate action to investigate and mitigate any suspected illegal traffic.

STIR/SHAKEN Compliance

As a pure reseller, **UponAI, LLC** relies on its upstream providers to implement STIR/SHAKEN in accordance with FCC requirements. The Company confirms that its underlying carriers have

certified compliance and are listed in the FCC Robocall Mitigation Database. The underlying providers comply with applicable STIR/SHAKEN standards and robocall mitigation regulations when delivering voice traffic.

UponAI, LLC has underlying providers from which it receives voice traffic:

1. Name: Commio
Phone Number: 9198900000
Email: support@commio.com
2. Name:
Phone Number:
Email:

The Company works closely with its upstream providers to prevent illegal robocalls and ensures strict adherence to regulatory requirements. The Company and its providers fully cooperate in responding to traceback requests and assisting authorities in identifying the source of suspicious traffic.

Traffic Monitoring and Enforcement

The Company reserves the right to refuse or block traffic from any party where illegal robocalling, spoofing, or use of unauthorized or invalid originating numbers is detected or suspected. The Company may block originating numbers, terminating numbers, trunks, or suspend or terminate customer accounts to prevent unlawful traffic from transiting its network.

Signed



Jody Gonzales
Chief Executive Office
UponAI, LLC