



Robocall Mitigation Program Description

ULEC, LLC, a registered telecommunications provider (FRN: 0037029717, OCN: 430L), submits this Robocall Mitigation Program Description in compliance with 47 CFR § 64.6305. ULEC is committed to preventing the origination, transit, or delivery of illegal robocalls on its network and adheres to the FCC's mitigation requirements for non-fully STIR/SHAKEN-enabled traffic.

STIR/SHAKEN Status:

ULEC has implemented the STIR/SHAKEN call authentication framework on portions of its IP-based network where technically feasible. Calls originating on those portions are signed in accordance with 47 CFR § 64.6301. Full deployment is underway. For all other traffic, mitigation steps are detailed below.

Know Your Customer (KYC):

ULEC performs due diligence on all customers prior to activation. We require business identity validation, use-case disclosures, and call volume expectations. High-risk use cases are flagged and either denied or subject to additional oversight.

Traffic Monitoring and Analysis:

Our systems monitor call patterns in real-time to detect spikes, short-duration calls, and anomalous traffic. Alerts trigger immediate internal review and, if needed, escalation or blocking.

Traceback Response:

ULEC responds within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group. We fully cooperate with investigations and take prompt action against violators.

Mitigation Enforcement:

If a customer is suspected of transmitting illegal traffic, ULEC may take actions including warning, rate restriction, suspension, or termination of service, based on severity and cooperation.

Robocall Mitigation Contact:

Kimberly Cupps, Compliance Officer

Email: compliance@ulec.com

Phone: 720-547-7369