

Robocall Mitigation Program Description

United Technologies Group

1. Company Overview and Role in the Call Chain

United Technologies Group is a U.S.-based VoIP service provider that supplies voice services to end users. We manage customer PBX systems, provide VoIP connectivity, and assign DIDs obtained from our upstream carriers. We do not operate our own carrier network and do not perform STIR/SHAKEN call authentication. All outbound calls are routed through VoIP carriers, who performs STIR/SHAKEN signing and attestation.

2. STIR/SHAKEN Exemption

Under **47 CFR § 64.6301**, United Technologies Group is not required to implement STIR/SHAKEN because we do not operate an IP-based voice network capable of performing call authentication. We rely entirely on our upstream carriers, to perform STIR/SHAKEN signing for all outbound calls. As a non-facilities-based VoIP provider, we comply with the robocall mitigation requirements under **47 CFR § 64.6305(a)**.

3. Robocall Mitigation Practices

We maintain a comprehensive robocall mitigation program that includes the following measures:

a. Customer Authentication

All customers must be verified before service activation. We require valid business information and verify identity to prevent fraudulent or anonymous access.

b. Access Controls

Only authenticated users may place outbound calls. We manage and secure customer PBX systems to prevent unauthorized access or call origination.

c. Traffic Monitoring

We actively monitor call patterns for unusual or suspicious activity, including:

- High-volume bursts
- Invalid or unassigned caller ID usage
- Repeated short-duration calls

- Traffic inconsistent with a customer's normal behavior

Suspicious activity triggers immediate review and potential suspension.

d. Fraud and Abuse Prevention

We enforce:

- Rate limits
- Call restrictions
- Geographic dialing controls
- Automatic blocking of known fraudulent destinations

e. Customer Education

We inform customers about legal calling practices and prohibit illegal robocalling, spoofing, or unsolicited mass calling.

4. Traceback Cooperation

United Technologies Group fully cooperates with the Industry Traceback Group (ITG), the FCC, and law enforcement. We commit to responding to all traceback requests **within 24 hours**, as required by FCC rules.

5. Enforcement Contact

Name: Elias Y.

Title: General Manager / CEO

Department: Management/Compliance

Email: elias@unitedtechnologiesgroup.com

Phone: 757-551-0580

6. Certification

United Technologies Group certifies that it maintains the above robocall mitigation program and complies with all obligations under **47 CFR § 64.6305(a)**.