

**Robocall Mitigation Plan**  
**Universal Business Team LLC**

Universal Business Team LLC (“Company” or “UBT”) submits the following Robocall Mitigation Plan in compliance with 47 CFR § 64.6305(d)(ii)-(iii).

**Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls:**

UBT has implemented meaningful protections to avoid originating illegal robocalls as part of its robocall mitigation program. For instance, UBT customers must agree to its Terms & Conditions, which are designed to combat robocalls before service is deployed. Customers agree that they not make an excessive number of calls to an unusually large number of recipients nor may they make high volumes of calls, or install any third party or external equipment to facilitate such calling. Non-enterprise customers are prohibited from using the service to earn revenue or other rewards.

UBT reserves the right to terminate any and all services if UBT believes, in its sole discretion, that the customer has breached any obligation of the Terms & Conditions. The Terms & Conditions expressly forbid the customer and require the customer to expressly agree that they shall not use UBT’s services to perform fraudulent, illegal activities or use the Services in any manner that constitutes a criminal offense or an unlawful act. UBT also reserves the right to impose limits on any customers’ usage of its services or to terminate its services, notwithstanding a customer’s purchase of an unlimited minute plan, if UBT believes, in its sole reasonable discretion, that such usage, including the total number of calls made and/or minutes used by a customer is not consistent with normal, fair, and reasonable use of UBT’s services.

**Description of Analytics to Block Illegal Traffic:**

UBT monitors its billing records for unusually high charges in order to verify that any such charges are not related to unusual calling patterns indicative of fraudulent or illegal activities. UBT’s suppliers also alert UBT to calling patterns that indicate fraud in order to allow UBT to investigate the associated accounts and determine if the calls being made are legitimate.

**Know Your Customer Practices:**

UBT maintains Know Your Customer (KYC) practices designed to ensure that voice services are provided only to known, identifiable customers and to prevent the use of UBT’s network for illegal robocalls, spoofing, or other unlawful activity.

Customer Eligibility and Relationship Requirements

UBT does not offer voice services to walk-up, anonymous, or unknown customers. Voice services are provided only to customers that already maintain an established business or household relationship with UBT through other services.

UBT does not permit:

- Public or self-service account sign-ups

- Anonymous VoIP access
- Standalone voice services to unknown third parties

All customers are onboarded through direct interaction with UBT personnel, rather than automated or open enrollment processes.

#### Identity and Account Verification

As part of onboarding and service provisioning:

- Each customer is identified as a specific individual or legal business entity known to UBT.
- Accounts are associated with verified service and billing information, including a physical service address.
- Voice services are provisioned only after the customer relationship has been established and approved internally.
- UBT does not allow customers to resell, sub-provision, or reassign voice services without UBT's knowledge and involvement.

#### Payment and Billing Controls

Voice services are billed through UBT's established billing systems to customers with whom UBT already maintains an ongoing commercial relationship. Payment information and billing responsibility are tied to the customer of record, ensuring accountability for service usage. UBT does not offer prepaid, disposable, or anonymous payment mechanisms for voice services.

#### Risk Limitation Through Service Design

UBT's service model inherently limits robocall risk:

- Voice services are provided as part of bundled technology and communications solutions, not as mass-calling platforms.
- Services are not marketed or configured for high-volume outbound calling, lead generation, or automated dialing.
- UBT does not provision customers with bulk outbound calling tools or robocall-oriented platforms.
- This service structure materially reduces the likelihood that UBT's network could be used to originate illegal robocalls.

#### Ongoing Oversight and Enforcement

Each voice service account is tied to a known customer of record, enabling UBT to:

- Identify the responsible party for originating traffic
- Investigate credible complaints or notices of suspected misuse
- Take corrective action, including suspension or termination of service, where appropriate

UBT's customer agreements prohibit illegal, deceptive, or fraudulent use of telecommunications services, including caller ID spoofing and robocall activity that violates FCC rules or applicable law.

**Know Your Upstream Provider Practices:**

UBT's upstream providers are nationwide mobile network operators ("MNOs"). UBT cooperates with its upstream MNOs and third parties, as necessary, to determine the origin of a voice call to or from a United States phone number that is suspected of being an illegal robocall.

**Commitment to Respond to Traceback Requests:**

UBT is willing and able to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

This Robocall Mitigation Plan describes the specific measures that UBT has implemented to as of 2026.02.26. UBT continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed.