

ROBOCALL MITIGATION PLAN

Upward Mobile, Inc.

FCC Robocall Mitigation Database Submission

Date: March 9, 2026

Version: 1.0

1. Company Information

1.1 Provider Identification

Legal Business Name: Upward Mobile, Inc.

Doing Business As (DBA): Upward Mobile

Principal Place of Business: Cincinnati, Ohio (Tristate Area)

Phone: (513) 322-5785

Email: support@upwardmobile.net

Website: https://upwardmobile.net

Service Hours: Monday–Saturday, 9:00 AM – 5:00 PM ET

1.2 Type of Provider

Upward Mobile, Inc. is a Mobile Virtual Network Operator (MVNO) providing prepaid, no-contract wireless voice, text, and data services to residential consumers in the Cincinnati, Ohio tristate area and nationwide. Upward Mobile resells service on major carrier networks and does not operate its own physical telecommunications infrastructure.

1.3 Designated Robocall Mitigation Contact

Name/Title: Compliance Officer, Upward Mobile, Inc.

Email: support@upwardmobile.net

Phone: (513) 322-5785

2. STIR/SHAKEN Implementation Status

As an MVNO, Upward Mobile does not directly control the call origination infrastructure on which its customers' calls are carried. STIR/SHAKEN implementation is governed by the underlying network carrier(s) with whom Upward Mobile has a wholesale service agreement. Upward Mobile's upstream provider(s) are responsible for signing and verifying calls in compliance with FCC rules.

2.1 STIR/SHAKEN Certification Status

Implementation Status: Upward Mobile relies on its upstream carrier partner(s) to implement STIR/SHAKEN call authentication on originated traffic.

Attestation Level: Full attestation (A-level) is applied by the upstream carrier where technically feasible.

SHAKEN Token Signer: Upstream carrier network partner.

2.2 Contractual Obligations

Upward Mobile's wholesale service agreement(s) with its network provider(s) include representations and provisions regarding compliance with applicable FCC robocall mitigation rules, including STIR/SHAKEN. Upward Mobile will update this plan as circumstances change.

3. Robocall Mitigation Program

Although Upward Mobile is a small MVNO with limited direct control over network infrastructure, the company maintains a Robocall Mitigation Program that incorporates the following policies and procedures:

3.1 Customer Onboarding Controls

- **Identity Verification:** All customers are required to provide verifiable personal information at the time of account creation. No anonymous account registration is permitted.
- **No Credit Check / Prepaid Model:** Upward Mobile operates a prepaid, no-contract model. Service is activated only upon receipt of payment, reducing risk of fraudulent bulk account creation.
- **Terms of Service Agreement:** All customers must affirmatively agree to Upward Mobile's Terms and Conditions of Service, which expressly prohibit use of the service for illegal robocalling, spoofing, or other unlawful calling activity.

3.2 Prohibition on Illegal Robocalling

Upward Mobile's Terms and Conditions of Service expressly prohibit customers from:

- Originating or facilitating illegal robocalls as defined under the Telephone Consumer Protection Act (TCPA) and FCC rules;
- Transmitting calls with false or misleading caller ID information in violation of the Truth in Caller ID Act;
- Transmitting artificially inflated call volumes, call blasting, or automated dialing campaigns without the required prior express written consent of called parties;
- Any other conduct that violates applicable federal or state telecommunications laws and regulations.

3.3 Monitoring and Anomaly Detection

- Upward Mobile will monitor for unusual patterns of customer call activity that may indicate illegal robocalling, including abnormally high call volumes originating from a single account.
- Upward Mobile will cooperate with its upstream carrier partner(s) to receive and act on alerts, traceback requests, or other notifications related to potentially illegal calling traffic.
- Upward Mobile will review any credible complaints received through customer service channels (phone, email) that allege illegal robocalling by one of its subscribers.

3.4 Response to Traceback Requests

Upward Mobile is committed to responding promptly to traceback requests from the USTelecom's Industry Traceback Group (ITG) or from law enforcement and will:

- Acknowledge receipt of a traceback request within 24 hours of receiving it;
- Provide a substantive response, to the extent technically feasible and legally permissible, within 72 hours;
- Take immediate action to suspend or terminate service for any customer confirmed as a source of illegal robocalls.

3.5 Enforcement and Consequences

Violations of Upward Mobile's robocall prohibitions may result in:

- Immediate suspension or termination of customer service, without refund;
- Reporting of customer information to law enforcement or regulatory authorities as required or permitted by law;
- Cooperation with civil and criminal investigations.

4. Upstream Provider Compliance

Because Upward Mobile is an MVNO that relies on wholesale network services from one or more underlying carriers, Upward Mobile takes the following steps to ensure its upstream providers are compliant:

- Upward Mobile will only do business with upstream carriers that are registered in the FCC's Robocall Mitigation Database and that represent they have adopted STIR/SHAKEN or an FCC-approved robocall mitigation program.
- Upward Mobile will periodically verify the continued registration of its upstream provider(s) in the FCC Robocall Mitigation Database.
- Upward Mobile will cooperate with upstream providers' robocall mitigation and call blocking programs and will promptly relay relevant traceback and complaint information.

5. Complaint Handling

Upward Mobile has established the following procedures for receiving and handling complaints related to robocalls:

- Complaints may be submitted by phone at (513) 322-5785 or by email at support@upwardmobile.net during business hours (Monday–Saturday, 9:00 AM – 5:00 PM ET).
- All complaints alleging illegal robocalling by an Upward Mobile subscriber will be logged and reviewed by the Compliance Officer within three (3) business days.
- If a complaint is substantiated, appropriate action will be taken, including account suspension or termination.
- Upward Mobile will cooperate fully with the FCC and other regulatory agencies investigating complaints.

6. Plan Review and Updates

Upward Mobile will review this Robocall Mitigation Plan at least annually, or sooner if required by changes in applicable law, regulations, FCC guidance, or material changes to the company's

business or technical operations. Updates to this Plan will be submitted to the FCC's Robocall Mitigation Database promptly after adoption.

This Plan was last reviewed and approved on: **March 9, 2026**

7. Certification and Signature

I, the undersigned authorized representative of Upward Mobile, Inc., hereby certify that the information contained in this Robocall Mitigation Plan is true and accurate to the best of my knowledge, information, and belief, and that Upward Mobile, Inc. has implemented the robocall mitigation measures described herein.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Organization: Upward Mobile, Inc.