Robocall Mitigation Program Description

comUnique, FRN 0039249032

1. Steps to avoid originating illegal robocalls

- Every account is opened by our staff for an identified business subscriber. There is no anonymous self-sign-up.
- Our service terms prohibit illegal robocalls, unsolicited bulk calling and caller-ID spoofing. Breach leads to immediate suspension and termination.
- A subscriber can send only caller IDs that are telephone numbers assigned to that subscriber in our system.
- Calls to high-cost international destinations are blocked by a per-minute price cap.
- We monitor traffic for anomalies and investigate them the same day. A subscriber found sending illegal or suspicious calls is suspended immediately.

2. Traceback and cooperation

We commit 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 our service to originate calls.