

**Advanced Tel, Inc.
Robocall Mitigation Plan
Revised April 2025**

Business Information

Advanced Tel, Inc. (“ATI”)
2685 Park Center Drive, Bldg. A
Simi Valley, CA 93065
FRN: 0015294140
OCN: 098L

Contact Information

Chris Fogel
Chief Technology Officer
805.433.8200
legal@intermetro.net

Overview

In the Commission’s release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) (“R&O”) it is stated that all voice service providers must file robocall mitigation plans (“RMPs”) that, among other things, outline “reasonable steps” taken to avoid originating illegal robocalls.

In addition to the “reasonable steps,” the FCC requires that a RMP include:

- “know your customer” procedures;
- “know your upstream provider”;
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and, if so, the name of the vendor.

The FCC previously stated that an RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

Advanced Tel, Inc, a California corporation (“ATI”) is a retail voice service provider to well-known, large enterprise business customers (>50 employees). ATI monitors new and existing customers from any potential Robocall traffic by the means further described in this RMP.

Know Your Customer (“KYC”)

Customer Screening: ATI only handles retail customers. From each Customer, ATI requires the following information which we maintain in company records.

- Physical location/address.
- Contact person.
- Place of incorporation (state or country).
- Federal tax ID number.
- Type of Customer’s account
(i.e., enterprise, call-center, small business)
- Nature of Customer’s business.
- Size of Customer’s business.
- Customers identified as “HIGH” (see section C) must also:
 - provide details about planned use of Company’s services that clarify/confirm Robocalls are not in use or planned to be used.
 - Provide written certification that they are not placing Robocalls.

ATI’s service agreements and contracts require Customers to comply with the ATI’s Acceptable Use Policy which prohibits Robocalls and allows ATI to report suspicious activity if/when identified.

Know Your Upstream Providers

The Commission’s directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51 requires voice service providers to describe their relationship with upstream providers. ATI submits the following:

- OUT-bound calls - ATI has no UPstream providers for outbound calls. ATI’s Customers are retail, enterprise end-users that initiate their OUT-bound calls directly from their PBXs and which are then handed off to DOWNstream carriers.
- IN-bound calls – ATI’s IN-bound Toll-Free calls originate solely UPstream from the large, Tier1 LEC providers (Verizon, Lumen, AT&T) and within which ATI passes any STIR/SHAKEN information provided. ATI has limited use of alternate carriers for some non-Toll-Free IN-bound calls, for which ATI ensures those carriers sign their calls and on which calls ATI passes any such information it receives. ATI will continue to pass any STIR/SHAKEN information received from its UPstream sources, and continue to work diligently with all carriers to mitigate Robocalls as needed, including prompt cooperation when receiving traceback requests.

Analytics for Monitoring Traffic

ATI uses the process below to establish call analytics system. It does not use a third-party vendor for this purpose.

1. Assign Monitoring Levels.

- Assess information obtained pursuant to the KYC process described above.
- Verify all business entities and their proclaimed business purpose.
- Initially assign levels (**Low or Medium**) of monitoring based on information from Customer related to potential Robocall activity:
 - **Low** = Customer information suggests it is not likely a potential Robocall generator;
 - **Medium** = Any Customer whose screening information indicates it might be a potential Robocall generator;
 - **High** = Any Customer where call monitoring has historically indicated potential Robocalling. **High** level status Customers must also provide written certification they are not generating Robocalls.

2. Call Analytics.

- Initial and periodic monitoring of all customers to validate Monitoring Level status assigned.
 - Validate **ANI/CallerID** against known Customer telephone numbers
 - Validate Monthly total **ALOC > 45 secs** (“Average Length of Call”)
- Customers that do not pass the above tests are then assigned the **High** monitoring status, which results in further internally-generated Call Analytic reports that review possible Robocall indicators:
 - Check for **ASR < 50** (very low call completion “Answer/Seizure Ratio”)
 - Check for **SD > 10%** call behavior (“Short Duration”)
 - Check for current monthly **call volume > 25% increase** over prior month

Investigate Suspicious Activity

When the Call Analytic reports indicate potential Robocalling, ATI will take appropriate actions which include some, or all, of the following:

- Contact Customer about suspicious activity;
- Potential limit or blocking of suspicious traffic pending further review;
- Potential suspension of Customers;
- Contact with relevant enforcement agencies, if appropriate.

ATI follows Industry Traceback Group (“ITG”)-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, ATI devotes sufficient resources to provide prompt and complete resources to traceback requests. In accordance with the Commission’s rules, ATI will respond to traceback requests within 24 hours of receiving notice of same.

Blocking

ATI will promptly respond to Do Not Originate requests it receives from ITG. ATI has mechanisms to block suspicious calls using internal analytics, as discussed above. If ATI identifies suspected robocalling patterns that are confirmed with further investigation, ATI will take appropriate action, which may include suspending or terminating the subscriber’s service. ATI will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys’ general offices), to the FCC, and/or ITG; as well as documenting requests and actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to respond to the dynamic nature of mitigating illegal robocalling. ATI will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, ATI will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Chris Fogel

I, Chris Fogel, Chief Technology Officer of Advanced Tel, Inc. (“ATI”) do hereby certify, under penalty of perjury, the following:

- ATI’s business name and primary address are as follows:
Advanced Tel, Inc.
2685 Park Center Drive, Bldg. A
Simi Valley, CA 93065
- ATI has no other business names in use.
- ATI has not previously used any other business name.
- The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- Affiliates: Advanced Tel, Inc., a California corporation, is wholly-owned by InterMetro, Inc., a Delaware corporation, which is wholly-owned by InterMetro Communications, Inc., a Nevada corporation.
- In the prior two years, neither ATI nor any entity for which ATI shares common ownership, management, directors, or control, has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to ATI’s transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.
- Company has implemented the STIR/SHAKEN authentication framework in its internet Protocol networks pursuant to 47 C.F.R. § 64.6301.
- ATI has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- ATI is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- ATI utilizes Operating Code Number “098L”.
- ATI is committed to responding fully within 24 hours to traceback requests and to cooperate with investigating authorities in their efforts to stop illegal Robocalls.



Chris Fogel, Chief Technology Officer