

ROBOCALL Mitigation Policy

U.S. Metrotel LLC

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Certification by voice service providers in the Robocall Mitigation Database

1. U.S. Metrotel certifies that all of calls that it originates on its network are subject to a robocall mitigation program consistent with the guidelines of 64.6305 'Robocall mitigation and certification'. Prior certifications have not been removed by Commission action and U.S. Metrotel has not been prohibited from filing in the Robocall Mitigation Database by the Commission.
 - a. U.S. Metrotel has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with § 64.6301(a)(1) and (2).
2.
 - a. U.S. Metrotel is not a foreign voice service provider and needs no extension as STIR/SHAKEN has been fully implemented.
 - b. U.S. Metrotel uses a mitigation technique of "Know Your Customer." U.S. Metrotel maintains a close relationship with each of our clients. Generally, each of these clients are organizations that will not be utilizing practices such as robocalling. U.S. Metrotel will incorporate contractual terms to ensure customers agree not to utilize robocalling technologies. U.S. Metrotel will review customer calling patterns to identify such activity if it is suspected. Technical limitations are in place as well as customers do not have direct access to the multitenant PBX system or our upstream vendors. Clients do not have the ability to perform any outbound calls over our network without utilizing a VOIP phone or our PBX system's applications such as gloCOM or gloCOM GO. The technology provided to our clients limits activity to one-to-one communications. U.S. Metrotel has a good long standing relationship with its upstream provider, VOIP Innovations who also takes care of STIR/SHAKEN implementation.
 - c. U.S. Metrotel commits to respond fully and in a timely manner 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.

- d. U.S. Metrotel has not 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 the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.