



Robocall Mitigation Policy





1. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of MTS Integratrak Inc. which provides services in the United States as well as internationally.

2.0 Cancellation or Expiration

The policies provided in this document do not have an expiration date. However, this document is reviewed and updated annually and is maintained by MTS Integratrak Inc's Vice President of Client Services.

3.0 Background

MTS Integratrak Inc. is a provider of information technology solutions which include Voice over IP phone services. MTS Integratrak Inc has worked with our selected providers/gateways over many years, and they are trusted providers as an Authorized Service Provider in the FCC database. We believe we are temporarily exempt from the requirements of §64.6301 as we participate with the industry to find an implementation solution before June 30, 2023

MTS Integratrak Inc is partnering with a trusted provider to implement STIR/SHAKEN in parts of its network as it is realistically able to, and it has implemented this policy for those portions of its network not yet compliant.

4.0 Scope

This policy applies to all MTS Integratrak Inc voice services and call origination facilities on our network.



5.0 Robocall Policy Statement

5.1 General Prohibition Against Illegal Robocalling

MTS Integratrak Inc. end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the MTS service to engage in or in connection with fraudulent activities In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

MTS Integratrak Inc end users are notified that MTS Integratrak Inc may take action up to suspension or termination of service for violation of the TOS.

5.2 Know Your Customer

MTS Integratrak Inc has implemented “know your customer” and traffic monitoring processes to mitigate the risk that it may inadvertently process or route illegal robocalls on behalf of its customers. Our customers have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

MTS Integratrak Inc has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change. follows procedures for ensuring it knows the identities of its customers, especially ones whose service permits them to engage in high volume calling campaigns, such as businesses engaged in telemarketing or contacting their customers for legitimate purposes.

MTS Integratrak Inc has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential.
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business.
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions.
- MTS Integratrak Inc ensures that the caller-ids for each DID/line are set during customer configuration.
- MTS Integratrak Inc selects the DID for any new customers, or if the customer is porting DIDs to us, those DIDs will be the only ones configured in our system.



- Any changes to service must come through our call center and a ticket created so we have an audit log of any changes made for the customer.

MTS Integratrak Inc serves a small number of long-time business end users with large volume calling capability that are being directly contacted to review with them MTS Integratrak Inc's policies and efforts to prevent the MTS Integratrak Inc network from being used for illegal robocalling.

5.3 Network Monitoring

MTS Integratrak Inc is continuing development of custom software in-house that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capability is being added to the software which will automatically disable any subscribers associated with flagged call patterns.

5.4 Third Parties and Agents

MTS Integratrak Inc does not provide carrier services to other providers that would engage in robocall activities.

6.0 Traceback and Enforcement Cooperation

MTS Integratrak Inc will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. MTS Integratrak Inc will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

7.0 Revision History

Version 1.0 - Nima Farsinejad, Project Manager	Date: 09/24/2021 (Initial Version)