

HMP Metrics, LLC. - Robocall Mitigation Program Description

This Robocall Mitigation Plan is submitted by Daniel Evans CEO of HMP Metrics, LLC.

(HMP) Under the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth HMP’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. HMP views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps HMP commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocalls that may use its service to originate calls.

I. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC’s Robocall Mitigation Database, HMP’s status with respect to STIR-SHAKEN implementation is as follows:

- HMP has not implemented the STIR/SHAKEN authentication framework on any portion of its network and all calls originating on its network are subject to the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using HMP’s service to originate illegal robocalls.

Presently, HMP relies on the continuing extension from STIR-SHAKEN implementation provided under 47 CFR § 64.6304 (d) which exempts from STIR-SHAKEN Caller ID Authentication those portions of a voice service provider network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP. More specifically, at this time no part of our existing network is capable of initiating, maintaining, carrying, processing, or terminating interconnected VoIP calls, with a continued transmission of STIR-SHAKEN attestation data.

II. TRACEBACK REQUESTS

As noted above, HMP will cooperate with the FCC, law enforcement, and the (ITG) on all traceback requests and investigations. To allow for timely and comprehensive law enforcement response efforts against illegal robocalls, HMP will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement, and/or the ITG, and commits to fully responding to any traceback request received within 24 hours after receiving the same. Within **Appendix A** to this Plan, HMP identifies a single point of contact for receiving all traceback requests.

As part of its efforts to assist in the successful traceback of illegal robocalls, HMP will going forward include within its carrier interconnection and/or service agreements language requiring traceback cooperation on any voice service calls exchanged. In part, these related contract provisions will specify the need for parties to promptly identify the upstream provider from which a suspected illegal robocall entered its network or the customer of the service from which the call originated.

III. CUSTOMER VETTING PRACTICES

HMP Metrics, LLC specializes in providing essential business office voice services **exclusively** to senior living facilities, including assisted living and skilled nursing facilities. By managing all configurations of phone services at these facilities, we ensure the prevention of robocall activities.

Committed to Preventing Illegal Robocalls

At HMP Metrics, LLC., we're dedicated to ensuring the integrity of our voice services and preventing illegal robocalls. To achieve this, we've implemented several measures to safeguard our network:

1. **Clear Terms of Service:** We've added a robust clause to our terms of service agreement, which clearly states that any customer found using our system for illegal robocalling purposes will have their services terminated.
2. **Proactive Monitoring:** Any DID (Direct Inward Dialing) number that exceeds 3500 minutes per month will be thoroughly investigated under the guidelines of our robocall policy to prevent misuse.
3. **Network Controls:** All calls on our network originate from a 3CX PBX, which is 100% maintained by HMP Metrics. We only allow business phones or fax devices on our network, ensuring that all traffic is legitimate and secure.

By implementing these measures, we're committed to maintaining a robocall-free environment for our customers and protecting the integrity of their communications.

IV. TELEPHONE NUMBER VALIDATION PRACTICES

HMP ensures that all new customers sign the necessary documentation for phone number setup and transfer. We then verify that the correct name, address, phone number, and 911 information are configured through our upstream carrier, Bandwidth, to ensure accurate caller ID identification.

V. INTERNATIONAL CALL ORIGINATORS

HMP is not currently an international voice services provider. If at any time HMP does sell its services to customers who are international call originators using North American Numbering Plan resources it will familiarize itself with and develop best practices for fulling vetting such customers and performing telephone number validation on all international originated calls.

VI. KNOW YOUR UPSTREAM PROVIDER PROCEDURES

HMP has exclusively relied on Bandwidth as its upstream provider. HMP has a long-standing relationship with this provider and is well-informed about its operations and the legitimacy of its call transmission services. Bandwidth is fully committed to adhering to all FCC guidelines and is dedicated to preventing robocalls.

VII. ONGOING ROBOCALL MITIGATION PRACTICES

HMP ensures that our clients' phone systems are secured to prevent any activities outside of normal business calls or the faxing of documents. We also monitor call volume for excessive usage, and any employee engaging in activities that deviate from standard business practices will be subject to the following steps:

1. Identify the employee who is misusing the business phones.
2. Provide a written notice stating that failure to cease any inappropriate conduct may result in the termination of services for that facility.
3. Follow up to confirm that the misconduct has stopped and that normal business practices are being resumed.

VIII. THIRD-PARTY ANALYTICS

HMP leverages its own internal database system to load and analyze customer call data, enabling us to monitor call volumes. This proactive approach allows us to identify unusual patterns and volume spikes that may indicate potential issues or anomalies.

Standardized Threshold: We've established a standardized threshold for senior living facilities, which is approximately 1000 minutes per month on average. This benchmark helps us quickly detect any deviations from normal call behavior, ensuring prompt investigation and resolution.

Appendix A

Traceback Request Single Point of Contact:

Name: Daniel Evans

Company: HMP Metrics, LLC.

FRN: **0031575624**

Title: CEO

Phone Number: 727-222-1245 ext. 103

Email Address: devans@hmpmetrics.com

Upstream Provider Information:

Name of Upstream Provider: Bandwidth Inc.

Official Address for Legal Process

Bandwidth Inc.

Attn: Custodian of Records

2230 Bandmate Way

Raleigh, NC 27607 USA

Email Address: uslawenforcement@bandwidth.com