

Metis Robocall Mitigation Program — Version 2025.11.30

Robocall Mitigation Program Description

Filed pursuant to 47 CFR § 64.6305(d)(ii)-(iii)

1. Company Overview

Metis LLC (“Metis”) is a U.S.-based messaging and communications provider established in 2015. Metis enables enterprise clients — including automotive manufacturers, franchised dealerships, financial institutions, education providers, and staffing companies — to send lawful, informational communications to their customers. Metis does not provide general-purpose origination services to the public, nor does it operate as a residential or high-volume telemarketer.

2. STIR/SHAKEN Implementation Status

Metis originates all calls through FCC-registered upstream carriers (Bandwidth, Telnyx, etc.), which perform all STIR/SHAKEN call authentication and attestation. Metis ensures:

- Only verified numbers assigned to or owned by clients are used as Caller ID.
- Caller ID is never spoofed, altered, or substituted.
- Calls are routed exclusively through upstream carriers that implement STIR/SHAKEN.

3. Robocall Mitigation Program (47 CFR § 64.6305(d)(ii))

Metis maintains and enforces the following measures to prevent the origination of unlawful robocalls:

a. Know Your Customer (KYC)

Metis maintains a documented KYC program to ensure new and renewing customers do not use Metis services to originate illegal robocalls or spoofed traffic. Key elements include:

1. Customer eligibility and prohibited use cases

- Metis provides service only to business customers.
- Metis does not onboard customers involved in high-risk or abusive calling verticals.
- Customers must describe industry, target geographies, types of called parties, and intended use cases.

2. Identity verification and documentation-Metis verifies:

- Legal business name and state of organization
- Employer Identification Number (EIN)
- Registered business address
- Primary contact name, title, email, and phone number
- Validity of business domain and website
- Business existence using public sources (e.g., Secretary of State records)

Metis does not collect government-issued personal identification. Service activation occurs only after identity details are validated.

3. Verification of calling use cases and consent practices

- Customers must describe the type of calls they will originate.
- Customers must maintain records of consent where applicable.
- Metis may request sample scripts, sample opt-in flows, or other materials for review.

4. Ongoing KYC and heightened review

- Annual or renewal-based customer reviews.
- Additional review when risk indicators arise.
- Possible traffic limits or documentation requirements for higher-risk customers.
- Non-responsive customers may be suspended or terminated.

5. Cooperation with traceback and law enforcement

Metis responds within 24 hours to traceback requests and cooperates fully with investigations.

b. Restricted Use Cases

Metis prohibits high-volume, autodialer-driven, or randomized robocalls. Calls must support legitimate transactional or informational purposes.

c. Consent and Compliance

Customers must maintain documented consent for consumer communications; opt-outs are enforced immediately across Metis systems.

d. Reassigned Number Database (RND) Checks

Metis integrates with the FCC RND to suppress calls and texts to disconnected or reassigned numbers.

e. Monitoring & Controls

Metis logs and monitors outbound activity for anomalies and enforces rate limits, number verification, and campaign-level approvals.

f. Complaint & Enforcement Response

Consumer complaints or traceback requests are reviewed immediately. Offending traffic may be suspended or terminated.

4. Compliance Contact (47 CFR § 64.6305(d)(iii))

Name: Derek Fournier

Title: Chief Compliance Officer

Business Address: 143 Cady Centre Suite #315, Northville MI 48167

Telephone: 844.898.3366

Email: compliance@metis.company

5. Certification

Metis LLC certifies that it:

Does not knowingly or negligently originate illegal robocall traffic onto the PSTN.

Implements a robust robocall mitigation program consistent with 47 CFR § 64.6305(d)(ii).

Maintains an identified compliance contact as required by 47 CFR § 64.6305(d)(iii).