

Robocall Mitigation Program (RMP)

Description

Company Name: Metis Communications Sh.P.K

FCC Registration Number (FRN): 33121211

OCN: L72405007A

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1. Introduction and Role Identification

Metis Communications Sh.P.K submits this Robocall Mitigation Program description in adherence to the Federal Communications Commission's (FCC) rules. We certify that we have implemented the specific mitigation steps and Know-Your-Customer/Upstream-Provider procedures detailed below to prevent the origination and transmission of illegal robocalls.

Provider Classification:

- **Voice Service Provider (VSP):** We originate traffic for end-user subscribers.

Voice Service Providers (VSP)

I. Mitigation Techniques (The "How")

Requirement: Describe specific reasonable steps to avoid originating illegal robocall traffic.

Metis Communications Sh.P.K employs the following specific analytic and blocking mechanisms:

1. Traffic Analysis & Analytics Engine:

- **Vendor/System:** We utilize Open Source / Self Developed CRM to analyze outgoing traffic.
- **Specific Metrics Monitored:** Our system flags traffic patterns indicative of robocalling, specifically monitoring for:
 - High-volume bursts of calls (e.g., exceeding 100 calls per minute).
 - Short-duration calls (e.g., massive volumes of calls under 6 seconds).
 - Low Average Seizure Rates (ASR) falling below 29%.
 - Sequential dialing patterns.

2. Action on Flagged Traffic:

- Upon detection of the anomalies listed above, our Operations Center, automatically blocks the trunk, suspends the user account, or routes traffic to a captcha/challenge system].

- We maintain a log of these actions for 12 months.
- 3. **Traceback Cooperation:**
 - We are a registered member of the Industry Traceback Group (ITG).
 - We maintain a dedicated "Traceback Team" reachable at info@metis.al that responds to traceback requests within 24 hours.

II. Know Your Customer (KYC) (The "Who")

Metis Communications Sh.P.K does not grant network access until the following vetting is complete:

1. **Identity Verification:**
 - For **Residential Customers:** We verify identity via government ID upload.
 - For **Business/Enterprise Customers:** We collect and verify the state Certificate of Good Standing, EIN, and physical business address.
2. **Contractual Restrictions:**
 - Our Terms of Service (ToS) explicitly prohibit the use of our network for autodialing without prior written consent (TCPA compliance) and prohibit caller ID spoofing.
 - Violation of these terms results in immediate contract termination.

Gateway Providers

I. Mitigation Techniques (The "How")

Metis Communications Sh.P.K strictly controls traffic entering the U.S. network from foreign points of origin:

1. **Foreign Traffic Analysis:**
 - We utilize Self Developed CRM to analyze 100% of ingress traffic from international gateways.
 - **DNO (Do Not Originate) Enforcement:** We strictly block any calls originating from numbers on the DNO list (e.g., IRS unallocated numbers, inbound-only toll-free numbers).
2. **24-Hour Traceback Requirement:**
 - As a Gateway Provider, we maintain a portal/API capable of responding to ITG traceback requests within 24 hours regarding any traffic we allowed into the U.S. network.
3. **Mandatory Blocking:**
 - We automatically block traffic from any upstream foreign provider that has been listed on an FCC Cease-and-Desist order or fails to mitigate traffic after notice.

II. Know Your Upstream Provider (The "Who")

Specific reasonable steps to confirm the identity of upstream foreign providers.

1. Upstream Vetting:

- We do not accept traffic from foreign carriers without a signed Interconnection Agreement.
- We verify that the foreign provider is registered in the Robocall Mitigation Database (RMDB) or has provided certification of their own mitigation measures.

2. Contractual Safeguards:

- Contracts include clauses requiring the foreign provider to cooperate with U.S. traceback efforts.
- Contracts allow Metis Communications Sh.P.K to withhold payment or terminate trunks if the upstream provider sends illegal robocalls.

2. Affirmations and Declarations

By submitting this plan to the Robocall Mitigation Database, Metis Communications Sh.P.K affirms:

1. We will fully cooperate with the FCC's Enforcement Bureau, the Industry Traceback Group, and other carriers in investigating and stopping illegal robocalls.
2. We have identified the specific personnel responsible for leading these mitigation efforts.
3. The descriptions provided above are accurate representations of our actual network practices and are not mere boilerplate language.

Authorized Representative:

FLORIAN SELMANAJ

ADMINISTRATOR

01 December 2025