

InterMetro Communications, Inc.
Robocall Mitigation Plan
Revised April 2025

Business Information

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FRN: 0015294150

Contact Information

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Overview

In the Commission’s release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) (“R&O”) it is stated that all intermediate providers must file robocall mitigation plans (“RMPs”) that, among other things, outline “reasonable steps” taken to avoid originating illegal robocalls.

In addition to the “reasonable steps,” the FCC requires that a RMP include:

- “know your customer” procedures;
- “know your upstream provider”;
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that an RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

InterMetro Communications, Inc., a Delaware Corp. (“InterMetro”), is a wholesale, non-gateway, intermediate provider that carries or processes traffic that traverses or will traverse the public switched network at any point, but it neither originates nor terminates that traffic. InterMetro accepts no calls from direct retail end-users or foreign-based carriers. InterMetro monitors new and existing customers from any potential Robocall traffic by the means further described in this RMP.

Know Your Customer (“KYC”)

All InterMetro customers are wholesale carriers themselves. InterMetro requires existing and new customers to provide the following information, on a “Know Your Customer” (KYC) form, which is maintained electronically in our records:

- Physical locations/addresses.
- Contact person and contact information.
- Place of incorporation (state or country).
- Principals and controlling entities.
- Federal tax ID number
- Type of Customer’s account (i.e., enterprise, call-center, small business)
- Nature of Customer’s business.
- FRN Number, RMD Number, IPR Registration info (if applicable)
- FCC 499 Filer ID (if filer); Tax Status
- Certification that the customer does not produce Robocalls and has not previously been found to initiate Robocalls by the FCC or the Industry Traceback Group.

Know Your Upstream Providers

In accordance with the Commission’s directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third*

Notice of Inquiry in CG Docket 17-59 (Rel. May 19, 2023) ¶¶ 49-51, InterMetro provides the following information concerning its upstream voice service carrier.

InterMetro has multiple upstream providers, that it uses from time-to-time. InterMetro serves as a wholesale, non-gateway, intermediate carrier to these upstream providers, who sign a Master Service Agreement and complete a thorough “Know Your Customer” form referenced above. The KYC signed form also includes assurance that the upstream carrier is not generating Robocalls. InterMetro and its upstream providers have agreed to work together diligently to mitigate illegal Robocalls, including fully cooperating with traceback requests when received.

In addition, our network will not accept any unsigned calls – all traffic must, at minimum, carry a Level “C” attestation. Any un-signed calls are rejected via a “503” response which the transmitting carrier than advances, if desired.

Analytics for Monitoring Traffic

InterMetro works with its upstream carriers to detect calling patterns consistent with illegal robocalls. If such a call is detected, we will identify the party that is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party’s ability to originate calls on our network.

No third-party vendors are involved in deploying InterMetro’s analytics.

Investigate Suspicious Activity

InterMetro and its upstream providers have implemented a monitoring system that automatically alerts the administrator when a specific caller ID exceeds a predetermined frequency threshold. This proactive measure ensures prompt detection and response to potential abuse or unusual activity patterns in our telecommunications network.

When traffic analysis indicates the presence of likely illegal robocalling, InterMetro and its upstream providers implement procedures, including the following:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

InterMetro follows Industry Traceback Group (“ITG”)-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, InterMetro devotes sufficient resources to provide prompt and complete resources to traceback requests. In accordance with the Commission’s rules, InterMetro will respond to traceback requests within 24 hours of receiving notice of same.

Blocking

InterMetro will promptly respond to Do Not Originate requests it receives from ITG. InterMetro has mechanisms to block suspicious calls using internal analytics. If InterMetro and/or its upstream providers identify suspected robocalling patterns that are confirmed with further investigation, InterMetro will take appropriate action, which may include suspending or terminating the subscriber’s service. InterMetro will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys’ general offices), to the FCC, and/or ITG; as well as documenting requests and actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to respond to the dynamic nature of mitigating illegal robocalling. InterMetro will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, InterMetro will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Chris Fogel

I, Chris Fogel, Chief Technology Officer of InterMetro Communications, Inc. (“InterMetro”), do hereby certify, under penalty of perjury, the following:

- InterMetro’s business name and primary address are as follows:

InterMetro Communications, Inc.
2685 Park Center Drive
Bldg. A
Simi Valley, CA 93065
- InterMetro has no other business names in use.
- InterMetro has not previously used any other business name.
- The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- InterMetro has the following affiliates: Advanced Tel, Inc. of California (which also has a dba “ATI”) and InterMetro, Inc. of Nevada.
- In the prior two years, neither InterMetro nor any entity for which InterMetro shares common ownership, management, directors, or control, has 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 InterMetro’s transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.
- As a wholesale, non-gateway, intermediate provider solely serving other carriers, InterMetro itself is not required to sign calls under the STIR/SHAKEN authentication framework pursuant to 47 C.F.R. § 64.6301 because InterMetro does not receive calls from originating providers. But it passes, without modification, any attestation information already within any call it receives from its upstream Customers.
- InterMetro has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- InterMetro is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- InterMetro is not required to, nor does it, have an Operating Code Number.
- InterMetro is committed to responding fully within 24 hours to traceback requests and to cooperate with investigating authorities in their efforts to stop illegal Robocalls.



Chris Fogel, Chief Technology Officer