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M3ST Limited Robocall Mitigation Program Plan

I. Introduction

M3ST Limited is committed to protecting our network and customers from illegal and unwanted robocalls. This document outlines our Robocall Mitigation Program in compliance with the FCC's regulations. Our program utilizes advanced analytics and automated blocking mechanisms to prevent suspected robocalls from passing through our network, ensuring a safer and more reliable communication environment for our users.

II. Company Information

- **Company Name:** M3ST Limited
- **FCC Registration Number (FRN):** 0035848381
- **Primary Contact:** Matthew Winder, Technical Director
- **Contact Information:** support@m3st.co.uk, +441923606655

III. Robocall Mitigation Program Overview

M3ST Limited has implemented a comprehensive Robocall Mitigation Program designed to identify and block suspected illegal robocalls before they reach our customers. Our program is based on state-of-the-art analytics, real-time monitoring, and automated blocking technologies that are continuously updated to respond to new and evolving threats.

IV. Robocall Mitigation Strategies

1. **Analytics-Based Call Profiling:**
 - M3ST Limited employs advanced analytics to create profiles of suspected robocalls based on various factors such as call patterns, frequency, duration, and origination points.
 - These analytics are continuously refined using machine learning algorithms, which enhance our ability to detect and classify potential robocalls with high accuracy.
2. **Automatic Blocking Mechanisms:**
 - Once a call is identified as a suspected robocall, our system automatically blocks the call from reaching its intended recipient.
 - This automated process is designed to minimize the impact on legitimate calls, with thresholds and parameters that can be adjusted as needed to reduce false positives.
3. **Real-Time Monitoring and Alerts:**

- Our system conducts real-time monitoring of call traffic across our network, looking for signs of robocall activity.
- When suspicious patterns are detected, our system generates alerts, triggering further analysis or immediate blocking actions.

4. Ongoing System Updates and Threat Intelligence:

- M3ST Limited subscribes to multiple sources of threat intelligence and regularly updates its systems to counter emerging robocall tactics.
- Our mitigation tools are constantly evolving, incorporating the latest industry best practices and regulatory guidance.
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V. STIR/SHAKEN Implementation Status

M3ST Limited has not implemented the STIR/SHAKEN authentication framework on any portion of its network. However, we are fully committed to the future implementation of STIR/SHAKEN and are actively working towards deploying the framework as soon as feasible.

VI. Robocall Mitigation Program Certification

M3ST Limited certifies that:

1. No STIR/SHAKEN Implementation:

- All of the calls that M3ST Limited originates on its network are subject to a robust robocall mitigation program consistent with 47 CFR § 64.6305(a).
- Our program includes reasonable steps to avoid originating illegal robocall traffic.
- We commit to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. We also commit to cooperating with these entities in investigating and stopping any illegal robocallers that use our service to originate calls.

2. No Prior Certification Removal:

- M3ST Limited certifies that any prior certification has not been removed by Commission action, and we have not been prohibited from filing in the Robocall Mitigation Database by the Commission.

VII. Customer Protection and Transparency

• Notification and Reporting:

- M3ST Limited provides clear and transparent communication to our customers regarding our robocall mitigation efforts.
- We offer reporting tools for customers to report suspected robocalls, which are then used to refine our analytics and blocking mechanisms.

• Customer Education:

- We regularly educate our customers on how to recognize and report robocalls and the importance of staying vigilant against potential scams.

VIII. Reporting and Record-Keeping

M3ST Limited maintains detailed records of our robocall mitigation efforts, including logs of blocked calls, updates to our analytics models, and our compliance with FCC regulations. These records are retained for the minimum period required by the FCC and are available for inspection upon request.

IX. Conclusion

M3ST Limited is dedicated to the continuous improvement of our Robocall Mitigation Program. Our commitment to using cutting-edge technology and best practices ensures that we effectively protect our network and customers from the growing threat of illegal robocalls.

Submitted by:

Matthew Winder
Technical Director
M3ST Limited
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