

Robocall Mitigation Plan

E-MetroTel LLC

Voice Service Provider Without a STIR/SHAKEN Obligation

1. Company Overview

E-MetroTel LLC is a voice service provider that offers outbound and inbound voice services to business customers.

2. Commitment to Preventing Illegal Robocalls

The company maintains effective, ongoing measures to prevent the origination of unlawful robocalls. These measures include customer vetting, traffic monitoring, traceback cooperation, and rapid mitigation actions when suspicious activity is detected. The company fully complies with all FCC robocall mitigation requirements.

3. Customer Vetting and Onboarding

The company uses a structured vetting process before enabling outbound calling:

- Identity verification — Collection and validation of business registration, EIN, physical address, and government-issued identification for authorized representatives.
- Service-use validation — Review of the customer's intended use case for outbound calling to ensure it aligns with lawful and legitimate business purposes.
- Call pattern risk assessment — Evaluation of expected call volumes, destinations, and calling patterns to identify potential high-risk scenarios.
- Prohibited-use disclosure — Customers must acknowledge and sign an agreement prohibiting illegal robocalls, spoofing, or any activity violating federal or state laws.

Customers who cannot be verified or who present elevated risk are denied service.

4. Ongoing Traffic Monitoring

The company continuously monitors outbound traffic for patterns associated with illegal robocalls. Monitoring includes:

- High-volume bursts inconsistent with the customer's profile
- Short-duration call spikes
- High answer-seizure ratio anomalies
- Sequential or random-number dialing patterns
- Unusual international or NANP-wide calling behavior

Automated alerts notify compliance staff when thresholds are exceeded. Suspicious traffic is immediately investigated.

5. Call Blocking and Mitigation Actions

When suspicious or potentially illegal traffic is detected, the company takes immediate action:

- Temporary call blocking for the affected customer or trunk
- Direct outreach to the customer for explanation and remediation
- Permanent service termination if illegal robocalling is confirmed
- Notification to upstream/downstream carriers when appropriate

All mitigation actions are documented and retained for compliance review.

6. Cooperation with Industry Traceback

The company fully cooperates with the Industry Traceback Group (ITG) and responds promptly to traceback requests. The company:

- Responds to all traceback requests within the required timeframe
- Provides accurate call-path information
- Takes corrective action when a traceback identifies unlawful traffic

7. Caller ID Integrity Although the company is not required to implement STIR/SHAKEN, it enforces strict caller ID policies:

- Customers may only use numbers they own or have documented authorization to use
- Unauthorized or misleading caller ID usage results in immediate suspension
- Caller ID validation is part of the onboarding process

8. Employee Training and Internal Controls

Compliance staff receive regular training on:

- FCC robocall rules
- Traffic analysis techniques
- Customer vetting procedures
- Traceback response requirements

Internal procedures are reviewed and updated annually.

9. Reporting and Recordkeeping

The company maintains records of:

- Customer onboarding documentation
- Traffic monitoring alerts
- Mitigation actions
- Traceback responses

Records are retained for a minimum of two years.

10. Compliance Contact

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