



Robocall Mitigation Program Description – Nettia Oy

This document describes the Robocall Mitigation Program adopted by Nettia Oy (the "filer") pursuant to 47 CFR § 64.6305.

1. Company Information

The filer, **Nettia Oy** (FCC Registration number: **0034741751**) , is a Voice over Internet Protocol (VoIP) service provider headquartered in Finland. Nettia Oy provides a Session Initiation Protocol (SIP)-based platform that allows its customers to originate outbound voice calls. These calls are routed through upstream carriers to mobile and landline networks in the United States and any other country in the world.

Nettia Oy does not issue or control North American Numbering Plan (NANP) telephone numbers.

Company contact details:

Nettia Oy

Vanha Talvitie 11C

00580 Helsinki, Finland

Company ID: 2206336-0 / FI22063360

2. STIR/SHAKEN Status

The filer has not implemented the STIR/SHAKEN authentication framework on its network.

As the company does not control NANP numbering resources and does not possess an Service Provider Code (SPC) token, it cannot obtain the necessary STIR/SHAKEN certificates. Therefore, Nettia Oy cannot authenticate calls using STIR/SHAKEN and instead maintains a robocall mitigation program consistent with 47 CFR § 64.6305.

3. Robocall Mitigation Practices

Nettia Oy employs the following key practices to reduce the initiation of illegal robocalls on its network:

- **Customer Verification:** Procedures are used to verify customer ownership of the used originating phonenumber before account activation to reduce the risk of platform misuse.
- **Contractual Prohibitions:** Customers are contractually prohibited from originating illegal robocalls, spoofed caller ID traffic, telemarketing or other unsolicited calls that violate applicable telecommunications laws, including but not limited to, the Telephone Consumer Protection Act (TCPA). All customers agree to the terms and conditions required by Nettia Oy on the website: <https://telz.com/en/terms/>
- **Traffic Monitoring:** Outbound call traffic is monitored for suspicious patterns such as excessive call volumes, short-duration calls, sequential dialing behavior, abnormal call distribution and payment behaviours.
- **Enforcement Actions:** Accounts that exhibit suspicious activity are subject to restriction, investigation, or termination of service.

4. Traffic Monitoring

Outbound traffic is actively monitored to identify patterns and anomalies associated with illegal robocalls and abusive calling practices. Monitoring includes analysis of the following traffic characteristics:

Characteristic	Monitoring Scope
Call Volumes	Detection of sudden or excessive spikes in call activity.
Answer Ratios	Identification of low answer rates, which may suggest illegal dialing patterns.

Characteristic	Monitoring Scope
Call Durations	Analysis of short-duration calls that may indicate auto-dialing or "junk" calls.
Call Distribution	Reviewing call patterns for sequential or rapid-fire dialing behavior.

5. Traceback Cooperation

Nettia Oy commits to full cooperation with traceback requests from the Federal Communications Commission (FCC), law enforcement agencies, and the Industry Traceback Group (ITG). The filer commits to respond fully and within 24 hours to all legitimate traceback requests.

Nettia Oy will fully cooperate with such entities in investigating and stopping any illegal robocallers utilizing its services.

6. Contact Information

Compliance and abuse inquiries related to this Robocall Mitigation Program may be directed to the filer’s designated compliance contact.

The company maintains internal procedures for reviewing and responding to abuse reports and regulatory requests:

Compliance Contact:

Detail	Information
Contact	Network Operations Center
Email	noc@nettia.fi

7. Certification and Signature

Detail	Information
Name	Ville Hartikainen
Title	CTO, Member of the Board
Date	2026/03/11
Place	Lahti, Finland
Signature	