

ROBOCALL MITIGATION PLAN

CALL METRIKS LLC

Company Information

Item	Details
Company Name	CALL METRIKS LLC
FRN	0038140042
FCC Form 499 Filer ID	838706
Principal Operating Address	1500 N GRANT ST #10065, DENVER, CO, 80203, USA
Website	www.callmetriks.com
Owner / Compliance Contact	Areeb Siddiqui
Email	support@callmetriks.com

1. STIR/SHAKEN Implementation Status

CALL METRIKS LLC has successfully implemented STIR/SHAKEN in compliance with applicable FCC regulatory requirements. The company is authorized to sign outbound calls using a valid STIR/SHAKEN certificate and follows ATIS standards and STI-GA policies.

CALL METRIKS LLC continuously maintains and monitors its STIR/SHAKEN framework to ensure proper call authentication, attestation accuracy, and compliance with industry best practices.

Attestation Framework

A-Level (Full Attestation)

Applied when CALL METRIKS LLC:

- Has a direct contractual relationship with the calling customer;
- Has validated the customer's identity; and
- Has verified authorization to use the displayed telephone number.

B-Level (Partial Attestation)

Applied when:

- The source provider can be authenticated; however,
- Independent verification of the caller's authorization to use the presented number cannot be fully confirmed.

This typically applies to trusted wholesale partners.

C-Level (Gateway Attestation)

Applied when:

- Calls enter the network from sources that cannot be fully authenticated; or
- Caller identity verification is unavailable.

Unsigned Traffic Review

Traffic received without a STIR/SHAKEN signature is subject to enhanced compliance review and fraud monitoring. Suspicious traffic may be restricted, quarantined, blocked, or further investigated before routing.

2. Business Model & Network Role

CALL METRIKS LLC participates in the telecommunications ecosystem in two primary capacities:

Wholesale Services

Providing voice termination and interconnection services to:

- Carrier partners
- Resellers
- Telecommunications providers

Direct Customer Services

Providing telecommunications services directly to retail and business customers originating traffic through the company's network and platform.

Estimated Traffic Distribution

Traffic Type	Percentage
Direct End-User Traffic	5% – 7%

Traffic Type	Percentage
Wholesale & Reseller Traffic	90% – 95%

3. Robocall Mitigation Program

CALL METRIKS LLC takes affirmative and effective measures to prevent its network from being used to originate illegal robocalls.

3.1 Know Your Customer (KYC) Procedures

- Identity verification of all customers prior to service activation.
- Collection of valid government identification.
- Collection of business registration records.
- Collection of tax identification documentation.
- Verification of authorized representatives.
- Risk-based customer onboarding and screening.
- Enhanced due diligence for high-risk industries including:
 - Debt recovery
 - Lead generation
 - Healthcare communications
 - Political outreach

3.2 Traffic Monitoring & Analytics

CALL METRIKS LLC continuously monitors inbound and outbound traffic using automated and manual review processes.

Monitoring includes:

- High-volume traffic spikes
- Short-duration call activity
- Sequential dialing patterns
- Auto-dialing behavior
- Completion-rate anomalies
- Other suspicious traffic indicators

Automated alerts are generated whenever unusual activity is detected.

3.3 Call Blocking & Filtering

The company utilizes automated fraud detection and filtering systems to:

- Block suspicious traffic;
- Prevent spoofed calling activity;
- Restrict calls with suspicious caller ID information; and
- Act upon STIR/SHAKEN verification warnings.

Traffic may be blocked, rejected, isolated, or investigated when warranted.

3.4 Do-Not-Originate (DNO) Protection

CALL METRIKS LLC maintains protections against caller ID spoofing and invalid number usage through:

- Industry-standard Do-Not-Originate (DNO) lists;
- Internal risk databases; and
- Blocking of invalid, unallocated, or spoofed telephone numbers.

3.5 Traceback Cooperation

CALL METRIKS LLC fully cooperates with traceback efforts and industry partners, including the U.S. Telecom Industry Traceback Group.

Traceback Procedures

- Responses to traceback requests within 24 hours or within the applicable regulatory timeframe.
- Investigation of the traffic source and associated customer account.
- Retention of traceback records for a minimum of two (2) years.

3.6 Upstream Provider Compliance

CALL METRIKS LLC works only with reputable and compliant upstream providers.

Preference is given to carriers that:

- Have implemented STIR/SHAKEN; and
- Maintain strong robocall mitigation and compliance programs.

3.7 Downstream Customer Enforcement & TCPA Controls

All customers must comply with:

- Telephone Consumer Protection Act (TCPA)
- Telemarketing Sales Rule (TSR)
- Federal and State Do-Not-Call requirements
- Company Terms of Service
- Acceptable Use Policy

Additional controls include:

- Consent documentation requirements for outbound campaigns when applicable.
- Continuous monitoring of customer traffic.
- Immediate investigation of suspicious activity.
- Immediate suspension or permanent termination for policy violations.

3.8 Record Retention

CALL METRIKS LLC maintains:

- Call Detail Records (CDRs)
- Traffic monitoring logs
- Customer compliance records

Records are retained for a minimum of two (2) years and are available for regulatory or traceback purposes upon request.

3.9 Regulatory Compliance

CALL METRIKS LLC complies with all applicable regulations related to robocall mitigation, including:

- FCC Robocall Mitigation Requirements
- Telephone Consumer Protection Act (TCPA)
- Telemarketing Sales Rule (TSR)
- Federal and State Do-Not-Call Requirements
- Applicable STIR/SHAKEN Obligations

4. Network Security & Traffic Controls

To maintain network integrity and minimize abuse, CALL METRIKS LLC employs multiple monitoring, fraud detection, and enforcement mechanisms.

Where policy violations are identified:

- Services may be suspended immediately;
- Traffic may be blocked or restricted; and
- Accounts may be permanently terminated depending on the severity of the violation.

5. Management & Public Presence

CALL METRIKS LLC is a privately owned telecommunications company.

Areeb Siddiqui serves as the Owner and primary point of contact for:

- Compliance
- Operations
- Carrier Relations
- Regulatory Matters

Management remains directly accessible and actively involved in day-to-day operations and compliance oversight.

The company continues to expand its public business presence and professional profiles across relevant industry platforms. Government-issued identification of the owner has been provided where required to support carrier due diligence and compliance reviews.

Submitted By

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