



Robocall Mitigation Program Description for Pay Tel Communications, Inc.

In the Second STIR/SHAKEN Order (rel. Oct. 1, 2020), the Federal Communications Commission (“FCC”) directed all voice service providers to: (1) certify that their traffic is either fully, partially, or not yet signed with STIR/SHAKEN; (2) certify that some or all of the calls they originate are subject to a robocall mitigation program and submit additional information with their certifications, including the type of extension or extensions received under FCC Rule 64.6304, specific reasonable steps taken under a program to avoid originating illegal robocalls, and a commitment to respond to traceback requests and to cooperate with investigating and stopping illegal robocalls; and (3) sign such certifications by an officer in conformity with FCC Rule 1.16.

This document is being filed in accordance with the above-referenced requirements.

Entities Covered by Filing

Pay Tel Communications, Inc. (Pay Tel) hereby files this Robocall Mitigation Plan on behalf of itself.

Robocall Mitigation Program

Pay Tel provides incarcerated persons communication services (“IPCS”) to correctional facilities throughout the United States. These services allow incarcerated persons to initiate telephone calls to their friends, family and other contacts outside the correctional facility. Pay Tel’s calling services are outgoing only. Incarcerated populations are not permitted to receive incoming calls while in custody.

When receiving an incarcerated person-initiated call, the called party is notified through an audible voice announcement that the call is from an incarcerated person at a specific confinement facility. This announcement is given prior to acceptance of the call. The called party’s caller ID display shows the Pay Tel name and/or a telephone number that (if called) will connect the called party to Pay Tel customer service.

In no circumstance does Pay Tel provide service to end user customers that receive caller ID information. Consumers (called parties) receiving incarcerated person-initiated calls may block the receipt of future calls by pressing a certain key when the call is presented to the outside party for acceptance or by contacting Pay Tel directly.

Pay Tel is subject to an extension of the STIR/SHAKEN implementation requirements under FCC Rule 64.6304(b) as a voice service provider that is “incapable of obtaining a [Service Provider

Code] token due to Governance Authority policy.” Under the rule, the extension remains in place until Pay Tel is “capable of obtaining a [Service Provider Code] token.” Under the current Service Provider Code (“SPC”) Token Policy issued by the Secure Telephone Identity Governance Authority in May 2021, a provider must have the following to receive a SPC token: (1) certification on file with

the FCC regarding the provider's status of implementing STIR/SHAKEN, (2) an Operating Company Number ("OCN"), and (3) a FCC Form 499-A report on file. The revised SPC Token Policy can be found at: <https://sti-ga.atis.org/wp-content/uploads/sites/14/2021/05/051021-SPC-token-Access-Policy-advisory.pdf>.

Pay Tel is a reseller and does not control the network infrastructure necessary to implement STIR/SHAKEN. Pay Tel has contracted with third-party providers to originate, transmit, and terminate inmate-initiated calls, as well as obtain telephone numbers on Pay Tel's behalf. As such, Pay Tel has not needed to obtain an OCN, and thus does not meet the requirements to receive a SPC token under the current SPC Token Policy. Pay Tel understands that its underlying third-party providers have obtained the necessary SPC token and have implemented the various STIR/SHAKEN attestation levels discussed in the Second STIR/SHAKEN Order for inmate-initiated calls originating via Pay Tel's IPCS system.

Given the specialized nature of Pay Tel's services, it is highly unlikely that illegal robocall traffic could be originated via Pay Tel's IPCS system. Nevertheless, Pay Tel works closely with its underlying third-party call termination providers to prevent, detect, and mitigate the delivery of illegal robocall traffic. As required, Pay Tel commits to respond to traceback requests within 24 hours. The designated contact for Traceback requests is Network Services Manager, Jason Reynolds jreynolds@paytel.com 336-455-8606.

Pay Tel agrees to update its submission within 10 business days of any change to the information in the RMD, including its Robocall Mitigation Program.