

STIR/SHAKEN and Robocall Mitigation Plan

Progressive Networking Solutions, Inc.

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Know Your Customer

Progressive Networking Solutions, Inc (PNS) follows the caller ID authentication best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

PNS only provides VoIP services to a handful of our long-term IT customers for which we have ongoing relationships. PNS controls all aspects of each customer's PBX provisioning and call volume is closely monitored.

Traceback

PNS responds to all traceback requests within 24 hours from the Commission, law enforcement, and the registered traceback consortium. PNS cooperates fully with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Know Your Upstream Provider

PNS exclusively utilizes VoIP Innovations' wholesale carrier services for all U.S. telephone number voice traffic. VoIP Innovations is registered with the STI-PA and is listed in the Robocall Mitigation Database.

PNS will not accept voice traffic from an unregistered provider.

PNS requires that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

PNS establishes an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. PNS uses this information to understand whether it will be obligated to authenticate unsigned traffic that it receives from them.

STIR/SHAKEN

PNS has registered with the STI-PA using OCN 051K and PNS has its own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate.

PNS has implemented a STIR/SHAKEN solution supplied by TransNexus.

Robocall Mitigation Program

PNS uses call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if PNS processes outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

PNS performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

PNS immediately investigates any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If PNS determines that the traffic was likely unlawful, then PNS warns them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then PNS terminates their service.