

Pigeonly Inc. Robocall Mitigation Plan

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I - Overview

In 2020, the Federal Communications Commission (FCC) issued rules requiring that certain communications service providers implement the STIR/SHAKEN call authentication framework and other robocall mitigation practices, generally by June 2021. A key element of the FCC rules is a requirement for all voice service providers to certify as to the status of their implementation of STIR/SHAKEN and, if the provider has not fully implemented the framework (including providers excused due to an extension), the provider must implement a robocall mitigation program on the exempted portions of its network.

Required elements of a robocall mitigation program:

- I. the provider must take reasonable steps to avoid originating illegal robocall traffic;*
- II. the provider must commit to respond to requests from the Industry Traceback Group to trace suspect calls for mitigation efforts; and*
- III. the provider must cooperate in investigating and stopping any illegal robocallers.*

This mitigation plan is submitted on behalf of Pigeonly Inc., a provider of communication services that help reduce the cost of communicating with incarcerated persons. Pigeonly Inc. provides these services to customers globally that are trying to communicate with persons incarcerated within jails and/or prisons in the United States. Voice services are a part of Pigeonly Inc. offerings that work by providing users with a cost optimized DID, Direct Inward Dialing, number that inmates dial to reach Pigeonly customers. Calls from inmates to Pigeonly provided DIDs are forwarded to DIDs already in use by the Pigeonly customer. Only calls originating from DIDs on the PAN, Pigeonly Accepted Numbers, list are accepted by our system and forwarded to the end user. DIDs are added to the PAN list manually, after being researched by Pigeonly technicians for validity.

Due to the way Pigeonly Voice services work, customers are unable to use the service to place outbound calls. This restriction makes it impossible for Robocalls to originate from the Pigeonly Voice Network through normal use of Pigeonly Services.

II - General Prohibition Against Illegal Robocalling

Pigeonly's end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its TOS, terms of service, requirements. As it is impossible for users of Pigeonly's phone services to place outbound calls Pigeonly does not currently make mention of robocalls in its terms of service agreement.

In addition, Pigeonly is planning on updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

III - Know Your Customer

Pigeonly Inc. utilizes the mitigation technique of KYC, Know Your Customer. Pigeonly Inc. is a small long established provider that maintains a close relationship with its subscribers. Its customers are generally family and friends of incarcerated individuals. As Pigeonly Inc. users are unable to use the service to place outbound calls it is impossible for its users to generate the high volume of traffic associated with robocalling allowing Pigeonly to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities. As part of the onboarding process for new subscribers Pigeonly takes steps to validate the identity of new subscribers and that the forwarding DID, provided to Pigeonly from subscribers, is valid and under the control of the subscriber.

Control of the subscriber provided forwarding DID is verified by placing a call to the provided DID and requesting acceptance of the service. To ensure users do not abuse this verification process we limit the number of verification attempts and capture the IP address of the user that caused the initiation of verification. If abuse of this verification system is suspected the subscriber's account is suspended.

IV - Network Monitoring

Pigeonly Inc. is continuing development of custom software in-house that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capability is being planned to the software which will automatically disable any subscribers associated with flagged call patterns.

V - Traceback and Enforcement Cooperation

Pigeonly Inc. will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Pigeonly Inc. will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

Glossary of Terms

Direct Inward Dialing, DID - a telephone number that allows a phone number to ring through directly to a specific phone

IP address - the numeric address of a computer on the Internet

Know Your Customer, KYC - Refers to the steps taken by a business to: Establish customer identity, Understand the nature of the customer's activities, and assess risks associated with that customer for purposes of monitoring the customer's activities.

Pigeonly Accepted Numbers, PAN, List - A list of DIDs associated with phone services provided by jails or prisons. DIDs are only added to this list after being researched by Pigeonly technicians.

Pigeonly Voice Network - A custom built VoIP system that allows for the forwarding of phone calls from DIDs on the PAN list to Pigeonly customer's DID.

Robocall - As defined by the FCC a robocall is any call made with an autodialer or that contains a message made with a prerecorded or artificial voice.

STIR/SHAKEN - a suite of protocols and procedures intended to combat caller ID spoofing on public telephone networks.

Terms of Service, TOS - the legal terms that set forth the nature, scope, and limits of a service (such as one offered through a website or an app) and the rules that the service's users must agree to follow.