



**PINDROP SECURITY, INC.
UPDATED ROBOCALL MITIGATION STATEMENT
APRIL 2024**

Pindrop Security, Inc. (“Pindrop”) supports the FCC’s efforts to implement STIR/SHAKEN, as well as the industry’s work to improve call authentication to eliminate unwanted robocalls and ensure that recipients only receive wanted calls. Pindrop’s mission is grounded in pursuing these same efforts on behalf of its customers. As set forth below, Pindrop submits that the STIR/SHAKEN regulations do not apply to it. Pindrop submits this revised Robocall Mitigation Statement to elaborate on its enterprise product offerings and its commitment to support the industry and the FCC’s regulations in accordance with 47 CFR § 64.305(c), which apply to non-gateway intermediate providers.

Pindrop is an information security company that provides risk scoring to its customers to help detect fraud and authenticate phone calls. Using Pindrop’s risk scoring, Pindrop customers can determine, according to their own specifications, the phone calls that they want to accept and distribute within their businesses. In so doing, Pindrop’s services further the Federal Communications Commission’s (“FCC’s”) efforts, implemented through STIR/SHAKEN, to combat robocalling and call spoofing.

Pindrop does not provide “voice services”¹ to its customers and does not provide transport or other “intermediate”² services to entities that are voice service providers. However, in providing risk scoring and fraud detection analytics, Pindrop may interact with traditional carriers on behalf of some of Pindrop’s enterprise customers in a way that might be misperceived as providing “voice services” or as an “intermediate provider.” Pindrop has registered in the Robocall Mitigation and Intermediate Provider Databases to avoid service disruption that could occur due to such misperceptions by “voice service” providers and “intermediate providers” with which Pindrop interacts on its customers’ behalf.³ Pindrop maintains that it does not fall within the ambit of the FCC’s definitions or STIR/SHAKEN compliance obligations more generally. Pindrop reserves its right to withdraw this filing and its database registration at its own discretion. Pindrop’s registrations and this filing should not be construed as Pindrop’s acquiescence to the FCC’s jurisdiction or regulation under STIR/SHAKEN.

In accordance with 47 CFR § 64.305(c), Pindrop commits to avoid carrying or processing illegal robocall traffic and to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. Pindrop further commits to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

¹ Pindrop does not provide “voice service(s)” as defined by 47 CFR § 64.6300(l).

² Pindrop is not an “intermediate provider” as defined by 47 CFR § 64.6300(f).

³ Voice service providers and intermediate providers “shall only accept calls directly from” a voice service provider with a “filing [that] appears in the Robocall Mitigation Database.” 47 § CFR 64.6305(c).