

## **Robocall Mitigation Plan**

### **Pontera Solutions Inc.**

#### **Introduction**

Pontera Solutions Inc. ("Pontera") 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. Pontera's integration of calling technology with its products is grounded in ensuring its customers do not receive calls they do not want. Pontera provides no ability for its customers or users to originate calls and generally does not provide "voice services" or route incoming calls anywhere other than to its customers. However, both in support of the Commission's efforts and to avoid any potential service disruption resulting from the application of the Commission's rules, Pontera submits this Robocall Mitigation Plan for inclusion in the Commission's database, based on Pontera's assessment that its interactions with the PSTN at most qualify it as a non-gateway intermediate provider.

#### **STIR/SHAKEN Implementation**

Pontera believes it has the STIR/SHAKEN authentication framework across its entire network and all calls it carries or processes are compliant with § 64.6302(b), to the extent required. Pontera's product receives incoming call traffic triggered by customer interaction, and forwards it to customers' phones, per customer preferences. As part of its efforts to avoid carrying or processing unwanted or illegal robocall traffic, and as noted above, Pontera does not provide any ability for users to originate calls, nor for its customers to route incoming calls anywhere other than to themselves. Pontera uses STIR/SHAKEN-compliant service providers to receive and deliver voice calls for termination by other providers, and has confirmed that its current service provider (Bandwidth) is compliant. Pontera looks to established, legitimate service providers in all cases, and will ensure that any providers it uses in the future continue to meet applicable standards.

#### **Traceback Requests**

Pontera is committed to cooperating with the FCC, law enforcement and the industry traceback consortium on all traceback requests and investigations. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, Pontera will ensure sufficient resources are available to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the industry traceback consortium, and commits to fully responding to any traceback request received within 24 hours of receipt. Pontera asks that traceback requests be sent to the following:

Name: Ani Nagendra

Title: Chief Financial Officer

Email: [ani@pontera.com](mailto:ani@pontera.com)

Phone: (888) 677-3339 ext 3