

Robocall Mitigation Plan

Business Information

Prompt.io Inc.
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Seattle WA 98133

Contact Information

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Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (2023) ("R&O"), it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

Prompt.io Inc. ("Prompt.io") is almost exclusively a texting software provider which purchases and integrates texting connectivity from its upstream providers (SignalWire, Bandwidth, Infobip and Twilio). Prompt.io texting customers may not use the Prompt.io platform to answer voice calls or originate outgoing voice calls commenced via the Prompt.io platform. In rare circumstances, Prompt.io allows well-established texting clients to forward incoming voice calls to other voice-enabled numbers that the client operates outside of the Prompt.io platform. As such, the only calls that "originate" from texting clients are from a customer's leased number that "connects" an incoming call from an end user to a client-provided voice-enabled number that the client configured the Prompt.io platform to "call".

Prompt.io has no control over the infrastructure necessary to implement STIR/SHAKEN. Because Prompt.io does not have access to the necessary infrastructure, it relies on its upstream carriers to

assist in robocall mitigation. As delineated herein, Prompt.io works closely with its upstream providers to carry out the required mitigation functions, where applicable.

Know Your Customer ("KYC")

Prompt.io clients all go through an individual contracting and onboarding process where clients are directly engaged with by our sales and customer support personnel. Prompt.io collects and reviews customer name, address, signing/billing officer and anticipated use case information before contracting with a customer. In cases where Prompt.io is not comfortable with a prospective customer's commitment to compliance, Prompt.io will elect not to contract with the prospective customer. Before clients can begin texting in the US via the Prompt.io platform, full details regarding their campaign must be submitted to The Campaign Registry Inc. for review by US carriers and in most cases, depending on the brand/campaign, go through third party verification via Aegis or Campaign Verify.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls, and Call Authentication Trust Anchor*, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, 38 FCC Rcd 5404 (2023), Prompt.io provides the following information concerning its upstream voice service carrier.

Prompt.io has four upstream providers from which it receives voice traffic:

- 1) SignalWire
228 Hamilton Ave
3rd Floor
Palo Alto CA 94301
Steve Starr
(650) 382-0000
steve.starr@signalwire.com
- 2) Twilio Inc
101 Spear Street, 1st Floor
San Francisco CA 94105
Amy Holcroft
(415) 295-4909
aholcroft@twilio.com
- 3) Bandwidth Inc
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
voicesecurity@bandwidth.com
- 4) Peerless Network, Inc
433 W. Van Buren
Suite 410S
Chicago IL 60607

Virginia Bodyfelt
regulatory@peerlessnetwork.com

Prompt.io has master service agreements with its upstream providers (in the case of Peerless, through Infobip) and has received assurances from their officials that they have, and will continue to, sign calls transmitted to Prompt.io and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Prompt.io. Prompt.io and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

Aside from platform functionality limitations that do not allow texting customers to originate outgoing voice calls from the Prompt.io platform, Prompt.io's Terms of Service and Acceptable Use Policy ("AUP") require compliance with all applicable laws, including specifically the TCPA, the TSR, and the Telephone Consumer Fraud & Abuse Prevention Act.

Among other things, the AUP prohibits:

- engaging in any unsolicited advertising, marketing or other activities, including any activities that violate anti-spam laws and regulations including the CAN SPAM Act of 2003, the Telephone Consumer Protection Act, and the Do-Not-Call Implementation Act (or any similar or analogous anti-spam, data protection or privacy legislation in any other jurisdiction);
- using the Services in connection with any unsolicited or harassing messages (commercial or otherwise) including unsolicited or unwanted phone calls, SMS or text messages, voice mail or faxes;
- violating or facilitating the violation of any local, state, federal or foreign law or regulation, including laws and regulations regarding the transmission of data or software; and
- creating a false sense of identity or forged email address or header, or phone number, or otherwise attempting to mislead others as to the identity of the sender or the origin of a message or phone call.

Prompt.io's contractual terms with subscribers specify that Prompt.io may take action up to suspension or termination of service for violation of the AUP.

Analytics for Monitoring Traffic

Prompt.io works with its upstream providers to identify behaviors which indicate illegal call activity. Prompt.io's terms also allow for suspension and/or termination of customers and any of their traffic in the case of any breach of applicable laws, violation of the AUP, etc. Customer texting traffic via Prompt.io is monitored for error rates in excess of industry norms and notifications are sent to Prompt.io as well as to the customer. As referenced above, Prompt.io has the ability to suspend or terminate a customer's usage of the Prompt.io platform. Prompt.io also receives occasional notifications from upstream connectivity providers re: opt outs or spam reports associated with Prompt.io client campaigns. Such information is shared with clients and, where applicable, investigated and responded to.

Because Prompt.io does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in Prompt.io's analytics.

Prompt.io follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Prompt.io will devote sufficient resources to provide prompt and complete resources to traceback requests. Prompt.io commits to responding to traceback requests fully within 24 hours.

Prompt.io works with its upstream providers to investigate suspicious activity found by the carriers' monitoring systems or reported to Prompt.io by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Prompt.io contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

Blocking

Prompt.io will implement Do Not Originate requests it receives from ITG. Prompt.io's upstream providers have mechanisms to automatically block suspicious calls using internal analytics. If Prompt.io and/or its upstream carriers identify suspected robocalling patterns that are confirmed with further investigation, Prompt.io will take appropriate action which may include suspending or terminating the subscriber's use of Prompt.io's service. Prompt.io will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to respond to the dynamic nature of mitigating illegal robocalling. Prompt.io will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, Prompt.io will file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Barbara Smith

I, Barbara Smith, the COO of Prompt.io, do hereby certify, under penalty of perjury, the following:

- (1) Prompt.io, by virtue of its status as a “pure reseller” does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- (2) Prompt.io ’s Business name and primary address are as follows:
Prompt.io Inc.
14419 Greenwood Ave N.
Ste A-373
Seattle WA 98133
- (3) Prompt.io has no other business names in use.
- (4) Prompt.io previously used the following business names: Chatbox Inc. and Tetrapod Software Inc.
- (5) The following persons/entities own more than 10% of Prompt.io each: Liberated LLC; Phil Gordon; LJV Opportunity Fund I, LP.
- (6) The following persons exercise management and control over Prompt.io: Phil Gordon, Barbara Smith, Faramarz Sokhansanj, and Robert Goldstein.
- (7) Prompt.io has the following subsidiaries: Tetrapod Software Canada Inc., Civic Element LLC.
- (8) None of the persons/entities in items 5 – 7 above have had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (9) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (10) Prompt.io’s role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (11) Prompt.io has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (12) Prompt.io is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (13) Prompt.io is not required to have, and does not have an operating company number.

/Barbara Smith/
Barbara Smith

Date: February 9, 2026