

Robocall Mitigation Database Filing

Filing Entity

PPLS Inc.
1221 Brickell Ave
Suite 900
Miami, FL 33131

Robocall Mitigation Contact

Nick Touris
CEO
1-800-800-5847
legal@ppls.com

Overview

PPLS Inc. (“PPLS”) does not currently generate voice traffic, but relies on its switch provider, RouteTrust, to allow calls to be processed – both toll free and DID. At this time PPLS does not have any end user customers, and PPLS acts as an end user customer;¹ it does not own or operate any network equipment or switches, and thus, it “lacks control of the network infrastructure necessary to implement STIR/SHAKEN”² and is considered a entity “without” a STIR/SHAKEN implementation obligation.³

Traffic Monitoring and Analysis

PPLS’ partner has implemented solutions to assist in monitoring traffic for robocall behavior (e.g., high call volumes, short call durations, etc). PPLS through the nature of its partnership benefits from such policies and analytics, including for instance, RouteTrust’s platform that includes the ability to accept or reject calls based on attestation value and/or other sensitivity tied to a number. As part of this, RouteTrust maintains access to DNO lists by third parties as well as an internal whitelist/blacklist for both phone numbers and IP addresses. PPLS, by virtue of its relationship with RouteTrust also has access to such tools. (see RMD0008599). PPLS will promptly investigate and mitigate illegal robocall traffic that is brought to its attention. If robocalls are identified they will be addressed and action will be taken which could include initiating a traceback investigation or blocking calls. Other than the foregoing, PPLS does not use any call analytics systems.

Know Our Customer and Know Our Provider Policies

Although PPLS does not have any customers at this time, it does recognize the importance of needing a thorough “Know Your Customer” policy and therefore provides an overview of the steps it will take if it seeks to onboard a customer. It will thoroughly vet and verify all customers

¹ Given the prescribed format of the RMD form, PPLS has selected “intermediate provider” to the extent PPLS plays a role in the call path.

² 35 FCC Rcd. 3241, 3260, para. 40.

³ 38 FCC Rcd. 2573, 2592, fn. 137 (“When referencing those providers ‘without’ a STIR/SHAKEN implementation obligation, we mean those providers . . . that lack control over the facilities necessary to implement STIR/SHAKEN.”)

identity and legitimacy through confirmation of contact information, email address, business address and if applicable, business registration. PPLS will also include contractual provisions that allow for the suspension or termination of service in the event that a customer uses such service for fraudulent or illegal activity, such as unwanted robocalling.

With respect to knowing its providers, PPLS conducts a detailed investigation of all of its provider partners to ensure that they are included in the robocall mitigation database and share in PPLS' goal of preventing the transmission of robocalls, including being STIR/SHAKEN compliant, if required. PPLS has entered into agreements with the following partners, Bandwidth (RMD0002564), Peerless (RMD0001419), and Sinch (RMD0018645). Many of these agreements require PPLS to be registered in the robocall mitigation database, impose fraud mitigation responsibilities and/or require PPLS to participate in traceback efforts to the extent it acts as an upstream provider (which it currently does not).

Traceback Commitment

To the extent PPLS plays a role in a call path and receives a traceback request, it is committed to responding fully and within twenty-four (24) hours of receipt to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocallers that use PPLS' service.

Miscellaneous

PPLS commits to updating its RMD filing as necessary and within 10 business days of changes (or as otherwise required by the FCC).