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ROBOCALL MITIGATION PLAN

I. INTRODUCTION AND BACKGROUND

The Federal Communications Commission (“Commission” or “FCC”) has directed voice service providers, as defined in the Commission’s rules, to upload a Robocall Mitigation Plan to the Robocall Mitigation Database that describes the specific reasonable steps the provider has taken to avoid, as applicable, the origination, carrying, or processing of illegal robocall traffic as part of its robocall mitigation plan. The FCC’s rules contemplate that the provider’s plan should describe how it “complies with its obligation to know its customers pursuant to § 64.1200(n)(4), any procedures in place to know its upstream providers, and the analytics system(s) it uses to identify and block illegal traffic, including whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s).” 47 C.F.R. § 64.6305(d)(1)(ii). The Commission has acknowledged, however, that, “we do not currently require [] providers other than gateway providers to engage in ‘know-your-upstream-provider’ procedures, [but] if they have put such procedures in place, they must be documented in their robocall mitigation plan,” and that “we do not specifically require providers to use call analytics.”¹ This Robocall Mitigation Plan (“RMP” or “Plan”) is being filed by Patient Prism, LLC (“Patient Prism” or “Provider”) in accordance with the above-referenced requirements.

II. BRIEF DESCRIPTION OF PROVIDER’S BUSINESS

Patient Prism, the entity covered by this Plan, is a Software-as-a-Service customer relationship management application and platform provider to members of the healthcare industry, such as dentists, primary care physicians, optometrists, etc.

Patient Prism’s platform contains an integrated communications tool, which includes voice component that facilitates *inter alia* outbound calls by health care providers to patients and prospective patients. Patient Prism is submitting this Plan in accordance with the FCC’s rules applicable to voice service providers to the extent the provision of the outbound call feature in

¹ Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97, FCC 23-18, ¶ 40, n. 155-56 (2023).

its application could be deemed a “voice service” as defined in the Commission’s Robocall Mitigation rules.

III. STIR/SHAKEN IMPLEMENTATION STATUS

Patient Prism has contracted with a third-party provider, Twilio, to originate, transmit, and facilitate termination of outbound calls initiated by its clients as well as to obtain telephone numbers used by its clients in originating such calls to patients and prospective patients.

However, Patient Prism does not have control over the relevant network infrastructure to implement the technical requirements of STIR/SHAKEN described under 47 C.F.R. § 64.6301. Thus, under the FCC’s robocall mitigation orders, Patient Prism is not required to implement STIR/SHAKEN.² Patient Prism does not have an Operating Company Number (“OCN”) from the National Exchange Carriers Association (“NECA”), which is typically obtained by carriers and providers to facilitate the exchange of information and traffic. Accordingly, Patient Prism does not meet the requirements to receive, and has not received, a Service Provider Code (“SPC”) Token under the Secure Telephone Identity Governance Authority’s Token Access Policy.

Patient Prism relies on the indefinite extension from STIR/SHAKEN implementation provided under 47 CFR § 64.6304 (b) as it does not have control over the relevant network infrastructure to implement the technical requirements of STIR/SHAKEN and it does not have the ability to obtain an SPC Token.

Nonetheless, Patient Prism understands that Twilio has obtained the necessary SPC Token and has implemented the various STIR/SHAKEN attestation levels and technical requirements for voice communications initiated by Patient Prism’s clients that originate on Twilio’s network.

To that effect, Patient Prism has implemented some STIR/SHAKEN process in that it strictly requires its customers to comply with Twilio’s STIR/SHAKEN procedures, including but not limited to registering telephone numbers obtaining through Twilio and verifying with Twilio that the customer has the right to use any numbers obtained by a provider other than Twilio.

IV. CUSTOMER VETTING PRACTICES

As a means of preventing or minimizing the origination of illegal robocalls through its voice services, Patient Prism will use best practices in vetting the identity of all of its clients. The subscriber vetting process is intended to help determine the legitimacy of a client for the purpose of establishing a service relationship.

² See Call Authentication Trust Anchor, et al, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97, No. 20-67, FCC 20-42, ¶ 40 (2020); see also Call Authentication Trust Anchor, Second Report and Order, WC Docket No. 17-97, FCC 20-136, ¶ 20 (2020).

- All clients are health care providers which undergo an extensive vetting process before entering into a subscriber agreement with Patient Prism. As part of this process, Patient Prism confirms the identify of customers using its voice services through collecting information such as physical customer location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer’s business. Patient Prism requires health care providers to gather patient’s consent (opt in) for messaging before contacting a patient, this consent is usually gathered in person at physical practice locations, however may also be collected online. Patients may have longstanding consent with their health care system before the Patient Prism’s system is used to engage with the patient.

Further, with respect to meeting existing obligations to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls, Patient Prism:

- Patient Prism’s agreement defines acceptable use policies as a means of preventing its new and existing subscribers from using their voice services in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity. These documents governing use of Provider provided services include terms indicating specifically to all customers that their services should not be used for the purpose of engaging in illegal messaging, and the Provider reserves authority within its service agreements to suspend or terminate a subscriber’s voice service for violating applicable service-related terms.

V. TELEPHONE NUMBER VALIDATION PRACTICES

Telephone Number Validation refers to the confirmation of the customer or end-user right to use a telephone number in connection with their subscribed voice service(s). In accord with industry best practices, Patient Prism has procedures in place to confirm the calling customer’s right to use a telephone number.

Specifically, a subscriber of the Patient Prism’s services is permitted to use a telephone number as their caller identity if a number is directly managed by the Provider via Twilio, or the telephone number has been verified by Twilio confirming the customer’s right to that telephone number.

VI. INTERNATIONAL CALL ORIGINATORS

Patient Prims is not currently an international voice services provider. If at any time Patient Prism does sell its services to customers which are international call originators using North American Numbering Plan resources it will familiarize itself with and develop best practices for fulling vetting such customers and performing telephone number validation on all international originated calls.

VII. TRACEBACK REQUESTS

Patient Prism commits to respond to traceback requests and to cooperate with investigating and stopping illegal robocalls as necessary. Patient Prism will respond to traceback requests received from the Industry Traceback Group, state and federal regulators, including the FCC, and law enforcement within 24 hours as required under FCC rules. Patient Prism will dedicate sufficient resources to provide timely and complete responses to such requests and will investigate suspicious activity found by its monitoring systems or reported to it by appropriate parties and take appropriate action as necessary.

VIII. ONGOING ROBOCALL MITIGATION PRACTICES

As explained above, Patient Prism is a non-facilities-based provider that lacks control over the network infrastructure necessary to implement STIR/SHAKEN, and therefore does not have a STIR/SHAKEN implementation obligation. Nevertheless, all of its clients' outbound calls originated via the Twilio network are authenticated, at the applicable levels, in accordance with STIR/SHAKEN.

Patient Prism also works closely with Twilio to prevent, detect, and mitigate the delivery of illegal robocall traffic. Patient Prism understands that Twilio is listed in the FCC's Robocall Mitigation Database, and it has implemented technical and operational processes, including analytics software, to monitor all traffic on its networks.

In cases where Patient Prism's end users originate telephone calls from telephone numbers obtained through Twilio, Patient Prism has a documented, verified relationship between the originating client and the telephone number(s) used to originate its calls. In cases where Patient Prism's end users originate telephone calls from telephone numbers acquired outside Twilio, Patient Prism's client must first verify the telephone number with Twilio before it is allowed to place any calls from Patient Prism's platform.