

Prodigy Solutions, Inc.
Robocall Mitigation Plan
V.1 February 2024

STIR/SHAKEN IMPLEMENTATION

Prodigy Solutions, Inc. (“Prodigy” or “Company”) provides incarcerated people’s communications services (“IPCS”) to correctional facilities throughout the United States. These services allow the incarcerated to initiate voice calls to their friends and families outside the correctional facility. Prodigy’s voice calling services are outgoing only; the incarcerated are not permitted to receive incoming voice calls.

Prodigy is a small voice service provider (“VSP”) that does not control the network infrastructure necessary to implement the STIR/SHAKEN technology. The Company has fully implemented the STIR/SHAKEN technology on its IP network utilizing their underlying provider to originate, transmit, and terminate calls initiated by incarcerated people. The Company has also implemented a Robocall Mitigation Program (“RMP”) to include the obligations outlined in the Commission’s recent release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023). In compliance with the Report & Order, Prodigy Solutions, Inc. submits this RMP and certification.

ROBOCALL MITIGATION

Background

The FCC Order requires that a RMP include the following affirmative obligations for voice service providers:

- Outline reasonable steps VSP has taken to effectively mitigate illegal robocall traffic;
- Commitment to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls;
- Know Your Customer procedures;
- Describe any call analytics system used to identify and block illegal traffic

Prodigy’s system and services allow inmates to remain in contact with family, friends and other associates while still providing facility administrators with the necessary control over inmate communications. The system utilizes IP-enabled technology by routing the calls over the existing broadband carrier’s facilities that currently serve the confinement facility. There are no wireline facilities used in the delivery of services, and the system only allows OUTGOING calls. Incarcerated individuals are not permitted to receive incoming calls. Prodigy’s system is designed so that calls are completed only to those called parties who specifically accept the charges for a call. Equipment utilized by Prodigy requires a positive response from the called party before the connection is established and billing can begin.

Due to the specialized nature of Prodigy’s services, it is highly unlikely that illegal robocall traffic could be originated via Prodigy’s inmate calling services system.

Traceback:

Prodigy commits to respond to traceback requests received from the Industry Traceback Group, the FCC, or law enforcement within twenty-four (24) hours as required under FCC rules.

Traceback Contact Information

Name	Title	Contact Information
James Hartman	CEO	866-700-4545 ext. 3

Prodigy will also cooperate fully with its underlying providers to cooperate with state and federal regulators to prevent, detect, and mitigate illegal robocalls as applicable.

Call Blocking:

The system is not designed to accept inbound calls. As a result, there is no requirement to monitor the RMD to identify calls coming from companies not registered in the Robocall Mitigation Database. For outbound calls, if an inmate makes a call to a party who no longer wants to receive calls from that inmate, the number can be added to a block list at the called party's request.

Telephone Number Authorization:

Prodigy works with their underlying provider to secure the required telephone numbers on their behalf.

CONCLUSION

The Company submits this Robocall Mitigation Program to comply with the Federal Communications Commission's Sixth Report and Order (FCC 20-187). Prodigy agrees to update its submission within 10 business days of any change to the information in the RMD, including its Robocall Mitigation Program.