

Pronto Connects (The Company) is a voice service provider as defined by the FCC rules. As a switchless reseller, The Company has no control over network operations and is not capable of implementing STIR/SHAKEN authentication itself. This responsibility lies with its upstream vendors, who are responsible for STIR/SHAKEN implementation on The Company's behalf. All vendors involved in the delivery of The Company's voice services are vetted to ensure that they are compliant.

Although The Company is not required to implement STIR/SHAKEN, it is obligated to submit the following Robocall Mitigation Plan:

The Company provides voice services to business and commercial customers only (no residential customers). The Company conducts a vetting process which requires verification of the customer's identity and legitimacy by collecting a list of telephone numbers, physical business address(es), email address(es), and contact information for a customer representative prior to onboarding. The Company confirms a customer's right to use telephone numbers by reviewing a Customer Service Record or telephone bill that lists the telephone numbers associated with the customer's account and requiring a signed Letter of Authorization (LOA) prior to engaging in Local Number Portability.

The Company has designated Rick Lang, President, as the point of contact responsible for handling traceback requests from the Industry Traceback Group, the FCC, and law enforcement. The Company's process for responding to these requests involves coordinating with its upstream vendors to obtain requested information and to take any actions directed by authorities. Additionally, The Company will notify its end users to comply with law enforcement requests.

For ongoing robocall mitigation, The Company relies on its upstream vendors to detect illegal robocalls originating from its customers. If illegal traffic is identified, The Company will notify its upstream vendors to restrict or suspend service on the offending telephone numbers. The Company's customer contracts include provisions that prohibit the use of its voice services for illegal activities, allowing suspension of service if violations occur.

Regarding call blocking, The Company depends on authorities and its upstream vendors to determine which traffic should be blocked. Since The Company does not offer voice services to other resellers or wholesalers, it does not monitor the Robocall Mitigation Database for compliance with blocking calls from unregistered providers. The Company does not sell services to international call originators using North American Numbering Plan numbers.

In summary, The Company's robocall mitigation plan focuses on compliance through registration in the FCC's Robocall Mitigation Database, cooperation with law enforcement and traceback efforts via its designated contact, rigorous customer vetting and telephone number validation, reliance on its upstream carriers for detection and mitigation of illegal robocalls, contractual provisions to suspend service for illegal use, and reliance on upstream vendors for STIR/SHAKEN implementation and call blocking decisions.