

# Pronto Mobile – Robocall Mitigation Policy and Process

---

Effective: May 1, 2025

Applies to: All Subscribers

## 1. Purpose and Scope

This document outlines Pronto Mobile's policies and procedures to detect, prevent, and mitigate unlawful or abusive robocalling activities on its network. As a consumer-only MVNO, Pronto Mobile prioritizes voice call integrity and compliance with all applicable FCC and industry standards concerning robocalls, spoofing, and fraud prevention.

## 2. Policy Statement

- Pronto Mobile is committed to preventing illegal or unwanted robocalls originating from or terminating on its network.
- The use of Pronto Mobile voice services for the purpose of placing robocalls, whether for marketing, political, or fraudulent purposes, is strictly prohibited.
- Violators may have their service suspended or permanently terminated and may be reported to enforcement bodies.

## 3. Definitions

- Robocall: An automated telephone call that delivers a recorded message, typically for telemarketing or fraudulent purposes.
- Spoofing: The act of falsifying caller ID information to mislead call recipients.
- STIR/SHAKEN: Industry protocols that verify caller ID information for calls using VoIP.

## 4. Prohibited Activities

The following are strictly prohibited on Pronto Mobile's network:

- Initiating automated calls without the recipient's prior express consent
- Use of auto-dialers, call blasts, or predictive dialers for mass outbound calling
- Spoofing caller ID to disguise call origin or impersonate legitimate entities
- Using Pronto Mobile numbers or SIMs for telemarketing or lead generation campaigns

## **5. Detection and Monitoring**

Pronto Mobile implements a range of tools and procedures to monitor call behavior, including:

- Real-time call analytics to detect anomalies and high-volume call origination
- Traffic pattern analysis to identify repeated short-duration or unanswered calls
- Signature matching against known robocall fingerprints
- Reputation checks and traceback in collaboration with voice providers and analytics firms

## **6. STIR/SHAKEN Participation**

Pronto Mobile ensures call authentication using the STIR/SHAKEN framework through its voice interconnect partners. All outbound VoIP calls are verified where technically feasible to ensure caller ID integrity and reduce spoofing.

## **7. Enforcement and Remediation**

Upon detection of potential robocalling:

1. The affected line may be suspended pending investigation.
2. Usage records and call logs are reviewed by technical and compliance teams.
3. Subscribers may be contacted for explanation or validation.
4. Confirmed violations result in permanent service disconnection and possible reporting to:
  - Industry traceback consortium
  - FCC enforcement division
  - Upstream carrier partners

## **8. Subscriber Education and Prevention**

- Subscriber Terms of Service prohibit robocalls and spoofing
- SIM welcome guides include prohibited usage notices
- High-risk subscribers may receive proactive warnings based on usage patterns
- Pronto support team assists in identifying and responding to suspected misuse

## **9. Industry Cooperation**

Pronto Mobile participates in industry initiatives to combat robocalls:

- Works with traceback groups and voice security consortiums
- Responds to upstream carrier alerts and call-blocking notices
- Contributes to caller ID reputation systems to protect consumers

## **10. Policy Review and Updates**

This policy is reviewed periodically and updated to reflect changes in:

- FCC rules and enforcement
- STIR/SHAKEN technical standards
- Threat landscapes and robocall origination tactics

Updated versions will be posted at <https://www.prontomobile.com/legal>

## **11. Contact Information**

To report suspicious calls or policy violations:

Email: [support@prontomobile.com](mailto:support@prontomobile.com)

Phone: 1-302-291-2092

Web: [www.prontomobile.com/contact](http://www.prontomobile.com/contact)