



OEConnect, LLC.

A wholly-owned subsidiary of Otsego Electric Cooperative, Inc.

P.O. Box 128
Hartwick, NY 13348-0128
Telephone: (607) 293-6622
Fax: (607) 293-6624

OEConnect, LLC.

Robocall Mitigation Plan

Date: 02/03/2026

OEConnect, LLC. is a wholly owned subsidiary of Otsego Electric Cooperative, Inc., which is incorporated in the state of New York and headquartered at 3192 County Highway 11, Hartwick, NY 13348. OEConnect, LLC. is not a foreign voice service provider.

Company Name (“Carrier”) covered by this certification: OEConnect, LLC.

Otsego Electric Cooperative, Inc. (Parent) and OEConnect, LLC (Subsidiary) Principals: CEO, Timothy Johnson; CFO, Cody Allen; CTO, James Foote.

Form 498 Filer ID: 143051583

Name and email of Signatory: James Foote, jim.foote@otsegoec.coop

Title of Signatory: Director of Technology

STATEMENT

OEConnect, LLC. relies upon Momentum Telecom, Inc. (Momentum) as OEConnect’s upstream voice services provider. Accordingly, OEConnect relies on procedures, policies, and safeguards implemented by Momentum to ensure that OEConnect’s residential and business customers are sufficiently protected against robocall and spoofing activities.

Robocall Mitigation Program:

Momentum uses call analytics provided by Sansay, Inc. and TransNexus to monitor OEConnect’s outbound voice traffic in real time to prevent the origination of illegal robocalls. The software identifies calling patterns that would indicate robocall activity, such as an unusual number of calls from a telephone number and/or an unusual number of short duration or incomplete calls. The software provides detailed reporting identifying suspected illegal robocalls. The software also provides alerts where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. There is an immediate investigation of any identified calls to determine if the caller was attempting to originate unlawful robocalls. If it is determined that the caller was attempting to originate unlawful robocalls, then OEConnect either warns them to stop or terminates their service, as appropriate pursuant to its Acceptable Use Policy.

Momentum has taken the following steps and procedures to fully implement the STIR/SHAKEN framework. Per Momentum:



OEConnect, LLC.

A wholly-owned subsidiary of Otsego Electric Cooperative, Inc.

P.O. Box 128
Hartwick, NY 13348-0128
Telephone: (607) 293-6622
Fax: (607) 293-6624

Momentum & WHL Provider has the duties and obligations to confirm the end-user or customer's right to use a telephone number. This is the area whereby STIR_SHAKEN Attestation Levels come into forefront establishing / assigning the attestation level (A-level; B-level and C-level) based upon the Service Providers most accurate information possible about the call and caller's legitimacy.

- The STIR/SHAKEN framework is an industry-standard caller ID authentication technology that allows for the authentication and verification of caller ID information for calls carried over IP networks. Calls traveling through interconnected phone networks can have their caller ID "signed" or "attested" as legitimate by originating carriers and validated by other carriers before reaching consumers. STIR/SHAKEN digitally validates the handoff of phone calls passing through the networks, allowing the carrier of the consumer receiving the call to verify that a call is in fact from the number displayed on Caller ID.
- The FCC has adopted rules requiring most providers to implement and use STIR/SHAKEN in the IP portions of their networks and requires that all providers certify in the publicly available Robocall Mitigation Database (<https://www.fcc.gov/robocall-mitigation-database>) that they have fully implemented STIR/SHAKEN or have instituted a robocall mitigation program to ensure that they are not originating illegal robocalls.
- Momentum has fully implemented STIR/SHAKEN and is registered in the RMD, which any of our customers can see by going to the FCC website.
- Attestation levels are a component of the STIR/SHAKEN process and are digitally applied to a call by the originating telecom carrier to verify the degree to which the carrier knows their customer (KYC) and if the carrier knows the customer has authorization to use the Caller ID number. In short, the attestation level provides a simple way for carriers to communicate with each other about the potential legitimacy of the phone call. The carrier must select the attestation that is appropriate for each call, as follows:
 - A-Attestation (Full attestation) indicates that the originating carrier knows the customer that initiated the call and the customer is authorized to use the Caller ID that the call is being originated from.
 - B-Attestation (Partial attestation) indicates that the originating carrier knows the customer that initiated the call but does not have an LOA indicating that the customer is authorized to use the Caller ID that the call is being originated from.
 - C-Attestation (Gateway attestation) means that the originating carrier does not know the caller's identity and the source of the call cannot be identified. This simply means that the call has been routed through a gateway that is STIR-SHAKEN compliant. Calls with this level of attestation are most likely to be blocked or tagged as spam.
- As Momentum has procedures in place to ensure that it knows its customers and their assigned TNs, it applies an A-level attestation to all calls by default.



OEConnect, LLC.

A wholly-owned subsidiary of Otsego Electric Cooperative, Inc.

P.O. Box 128
Hartwick, NY 13348-0128
Telephone: (607) 293-6622
Fax: (607) 293-6624

OEConnect, LLC. also takes steps to verify its end users when on-boarding all new customers as part of the call chain.

Traceback:

OEConnect responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperates with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Signed: James Foote
James Foote, Director of Technology