

Delta Fiber LLC dba DE LightSpeed
Robocall Mitigation Certification and Plan
February 23, 2024

CERTIFICATION

Pursuant to section 64.6305 of the Federal Communications Commission's (the "Commission") rules, Delta Fiber LLC, a Mississippi limited liability company, dba DE LightSpeed ("Delta Fiber") submits this document addressing its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls.

Delta Fiber provides high-speed broadband internet and VoIP phone service to business and residential customers and is considered a voice service provider under section 64.6305. [REDACTED]. (" [REDACTED] ") is Delta Fiber's underlying voice service provider. Delta Fiber relies on procedures, policies, and safeguards implemented by [REDACTED] to ensure that Delta Fiber's residential and business customers are sufficiently protected against illegal robocall and spoofing activities.

Delta Fiber is a voice provider without a STIR/SHAKEN obligation; our underlying voice provider has certified "Complete" STIR/SHAKEN implementation.

All calls that originate on Delta Fiber's network are subject to the Robocall Mitigation Program set forth below.

Delta Fiber has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

Delta Fiber has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

Traceback

Delta Fiber is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using Delta Fiber's service to originate calls. Delta Fiber will respond within 24 hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group (ITG), and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate illegal robocalls.

Identifying Information

Primary address of the provider: 1700 Highway 82 West, Greenwood, MS 38930

Other business names in use: DE LightSpeed

All business names previously used: None

Delta Fiber is not a foreign voice service provider.

Individual within company responsible for addressing robocall mitigation-related issues:

Harold Pittman, CEO

P.O. Box 9399, Greenwood, MS 38930

ROBOCALL MITIGATION PLAN

STIR/SHAKEN Implementation

██████████, Delta Fiber's underlying voice service provider, has fully implemented STIR/SHAKEN. ██████████ authenticates Delta Fiber's voice traffic using STIR/SHAKEN, providing A-level attestation for all of Delta Fiber's calls.

Robocall Mitigation Program

Use of Call Analytics to Identify and Block Unlawful Traffic. In addition to implementing STIR/SHAKEN on its network, ██████████ has also implemented its own call analytics to identify unlawful traffic originated by its own retail customers and the end-user customers of its wholesale customers, including Delta Fiber. ██████████ call analytics can detect call patterns that indicate robocall activity, including, but not limited to, an unusually large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a single ring. ██████████ call analytics also can detect where the calling number is invalid, unallocated, or on the ITG's Do Not Originate ("DNO") list. If ██████████ call analytics detect any of the above-described issues with the outbound traffic of a Delta Fiber end-user customer, ██████████ alerts Delta Fiber's contact representative and asks Delta Fiber to investigate the issue and inform ██████████: (i) when the issue is resolved; and (ii) what actions, if any, Delta Fiber took in resolving the issue. Upon receipt of any alert from ██████████, Delta Fiber will conduct an immediate investigation to determine if the caller was attempting to originate unlawful robocalls. If confirmed, Delta Fiber will take appropriate action in accordance with its Acceptable Use Policy which may include issuance of a warning to the customer, account suspension, or account termination.

Know-our-Customer. Delta Fiber vets each new customer upon application for service, entering new or renewal contracts, and/or provisioning network connectivity. Delta Fiber confirms the identity of new or renewing business customers by collecting information concerning the business or company name and address, physical location of the business, contact information, and the customer's Federal Taxpayer Identification Number(TIN), where appropriate. With respect to residential customers, Delta Fiber verifies each customer's name and address, physical service location, and contact information. Delta Fiber may also utilize third-party agencies to gauge credit and/or fraud risk associated with a potential business or residential customer.

Description of Contractual Provisions. Delta Fiber's Terms and Conditions, which must be acknowledged and agreed upon by all customers prior to service initiation, include a provision requiring customers to comply with all applicable laws in connection with the customer's use of Delta Fiber's services. Pursuant to the Terms and Conditions, in order to protect its network from any unlawful use, Delta Fiber may take action, including suspension or termination of service. All customers must also agree to abide by Delta Fiber's Acceptable Use Policy, which prohibits customers from engaging in any activity, whether illegal or not, that Delta Fiber, in its sole discretion, determines to be harmful to its subscribers, operations, or networks. To the extent a customer is found to have violated its contractual obligations, Delta Fiber will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning, suspending or terminating the customer's service, and/or reporting the misconduct to the appropriate authorities.

Know-Your-Upstream Provider. Delta Fiber's sole upstream Provider is [REDACTED] which is registered in the Robocall Mitigation Database and has fully implemented the STIR/SHAKEN framework. Delta Fiber relies on procedures and policies implemented by [REDACTED] to mitigate illegal robocalls.

[REDACTED] has confirmed it knows all of its upstream providers from which it directly receives traffic and has insight into its upstream providers' policies and procedures related to identifying and blocking unlawful robocall traffic through [REDACTED] review of these providers' robocall mitigation plans.

[REDACTED] also confirms that all upstream providers from which it receives traffic are listed in the FCC's Robocall Mitigation Database.

Cooperation with Traceback Group, Law Enforcement and Government Agencies. Delta Fiber will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and ITG, and will cooperate with such agencies in investigating and stopping any robocallers that use Delta Fiber's network to originate illegal robocalls.

Delta Fiber's underlying voice services provider, [REDACTED], is also committed to responding fully and within 24 hours to all traceback requests made by ITG, law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated or passed to [REDACTED]. Delta Fiber has agreed to cooperate with [REDACTED] in responding to ITG traceback requests, as detailed above.

Delta Fiber and [REDACTED] are committed to fully complying with the Commission's robocall blocking requirements, and [REDACTED] has confirmed that it will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITG. [REDACTED] also blocks the traffic of all foreign providers and gateway providers that have not registered in the Robocall Mitigation Database.

Delta Fiber reserves the right to modify and/or supplement its Robocall Mitigation Plan to adapt to risks and to improve the overall effectiveness of its program.