

**Central Virginia Services, Inc. dba Firefly Fiber Broadband**  
**Robocall Mitigation Certification and Plan**

Central Virginia Services, Inc. dba Firefly Fiber Broadband ("Firefly") submits this Robocall Mitigation Plan pursuant to Section 64.6305 of the Federal Communications Commission's ("Commission" or "FCC") rules.

Firefly is a broadband provider that resells VoIP services of Momentum Telecom, Inc. ("Momentum"). Firefly relies on procedures, policies, and safeguards implemented by Momentum to ensure that its residential and business customers are protected against robocall and spoofing activities.

**STIR/SHAKEN Implementation.**

Firefly is a voice service provider without a STIR/SHAKEN obligation serving end-users. Our underlying provider has implemented the STIR/SHAKEN call authentication framework within its network

**Enforcement**

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan.

Firefly and/or any entity for which the filing entity shares common ownership, management, directors, or control have never 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. Firefly has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Firefly is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Firefly will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that our service to carry, process, or originate robocalls.

**Company Identifying Information**

Central Virginia Services, Inc.

Other business names in use: Firefly Fiber Broadband

All business names previously used: None

Firefly is not a foreign voice service provider.

OCN: None

Individual responsible for addressing robocall mitigation-related issues:

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## **Robocall Mitigation Plan**

As detailed herein, Firefly takes specific reasonable steps, including call monitoring, to avoid originating illegal robocall traffic. Firefly 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.

**Call Analytics.** As a reseller, Firefly relies on Momentum's call analytics to monitor call traffic. Momentum has implemented its own call analytics to identify unlawful traffic originated by its retail customers and the end users of its wholesale customers' services. Momentum states:

Its call analytics can detect call patterns that indicate robocall activity, including, but not necessarily 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. Momentum's call analytics also can detect where the calling number is invalid, unallocated, or on Industry Traceback Group's Do Not Originate list. If Momentum's call analytics detect any of the above-described issues, an internal report is generated that summarizes the issues presented and the applicable wholesale or retail customer that is responsible for the underlying calls. If Momentum's analytics report indicates potential illegal robocall activity by a wholesale end user customer, Momentum alerts the wholesale customer's contact representative and asks the customer to investigate the issue and thereafter inform Momentum: (i) when the issue is resolved and (ii) what actions the wholesale customer took in resolving the issue. In the event that Momentum's analytics report indicates potential illegal robocall activity by one of its own retail customers, Momentum conducts its own investigation into the customer and the calls at issue. After concluding its investigation, Momentum will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service and/or reporting the misconduct to the appropriate authorities.

Our Acceptable Use Policy prohibits utilizing our network for deceptive purposes, engaging in fraudulent activities, and violating local, state, or federal laws. Firefly will also take action against customers who violated our AUP. Such action may include suspending or terminating the service of violators.

**Know-Your-Customer Processes.** Firefly relies on Momentum's know-your-customer processes. Momentum vets the identity of its wholesale customers prior to entering into a contract for VoIP services. Momentum's wholesale customers are expected to vet their end user subscribers consistent with the FCC's robocall mitigation rules. Momentum's wholesale contracts prohibit the use of its services to originate unlawful traffic. Momentum also vets the identity of the customers to whom it provides retail telephone service when: (i) approving an application for service; (ii) provisioning network connectivity; (iii) entering into a contract agreement; or (iv) granting the right to use telephone number resources.

Momentum collects from retail customers their name and address, physical location, contact information, and, for business and enterprise customers, their jurisdiction of

incorporation, federal tax ID, and nature of business. Momentum may also utilize third-party agencies to gauge credit and/or fraud risk associated with a potential customer. Momentum's policy is to request additional information from the customer if Momentum cannot validate the customer based on the initial information provided. Momentum will not provide service if a new customer's identification cannot be verified. Through its retail terms of service, Momentum requires its enterprise customers to comply with all applicable laws in relation to its voice services, explicitly prohibiting any abusive or unlawful use of the service.

Firefly vets the identity of our subscribers when approving new or renewal applications for Internet and Voice services, provisioning network connectivity, and entering into any contract agreements. Our retail voice customers are in or near the geographic area of our parent electric cooperative. As such, we know our customers – our customers reside in the communities in which we operate in and are electric cooperative members. The vast majority of our end-user customers are either residential or single-party business lines. These customers are limited to one call path, thereby minimizing the overall risk of robocalls originating from our customers. We have not received information suggesting that robocalls are likely to originate on our network. Therefore, we do not consider our network at high risk of originating illegal robocalls.

Additionally, as part of our Operating Procedures, we conduct due diligence on new or renewing voice customers, by confirming the customer's identity for residential and businesses. Firefly confirms the service address, the customer's identity, and email address of all customers. Firefly verifies customer information when services are renewed or added.

**Know-Your-Upstream Provider.** Firefly relies on the Momentum's Know-Your-Upstream provider processes. Momentum states that it knows all the 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 Momentum's review of these providers' robocall mitigation. Momentum confirms that all upstream providers from which it receives traffic are listed in the FCC's Robocall Mitigation Database.

**Traceback.** Firefly (and Momentum) commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate illegal robocalls.