

Robocall Mitigation Plan

Updated September 3, 2025



The City of Loveland – Municipal Fiber dba Pulse is a Broadband Provider and a voice service provider without a STIR/SHAKEN implementation obligation. We utilize Momentum as a third-party provider of VoIP services and therefore lack control of the network infrastructure necessary to implement STIR/SHAKEN. Pulse relies on procedures, policies, and safeguards implemented by Momentum to ensure that our residential and business customers are sufficiently protected against robocall and spoofing activities. Momentum has implemented STIR/SHAKEN within its network and signs the originating calls on behalf of Pulse’s customers. Momentum utilizes the Sansay and TransNexus STIR/SHAKEN platforms.

Know Your Customer

Per the guidelines and requirements set forth by the FCC, it is an essential part of STIR/SHAKEN that all Voice Service Providers “Know Your Customer”. In accordance with this requirement, Pulse follows several processes and procedures to ensure we have accurate and current information regarding all our customers. These include:

- Obtaining Service Agreements
- Vetting our new and returning customers by gathering contact information
- If the customer applies in person, a photo ID is requested to verify applicant’s identity

Upstream Provider Knowledge

Pulse through Momentum knows all the carriers from which it receives traffic.

Traceback

Pulse is a Broadband Provider committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers. We will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

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STIR/SHAKEN

As a white label service provider for Momentum VoIP services, Pulse relies on the STIR/SHAKEN process implemented by Momentum.

Robocall Mitigation Program

Pulse follows all policies and procedures of our third-party provider Momentum's Robocall Mitigation Program.

Robocall Mitigation Database Eligibility

Pulse has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling and has not been prohibited from filing in the Robocall Mitigation Database (RMD).

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