

PD Fiber, LLC
Robocall Mitigation Certification and Plan

PD Fiber, LLC submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the Federal Communications Commission's (Commission's or FCC's) rules.

PD Fiber is a voice service provider without a STIR/SHAKEN obligation serving end-users. Momentum Telecom, Inc. (Momentum) is PD Fiber's underlying provider.

Momentum has certified that it has "Complete STIR/SHAKEN" implementation.

PD Fiber relies on procedures, policies, and safeguards implemented by Momentum to ensure that PD Fiber's residential and business customers are sufficiently protected against robocall and spoofing activities.

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

PD Fiber 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.

PD Fiber has not been prohibited from filing in the Robocall Mitigation Database.

Traceback

PD Fiber 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 unlawful robocalls. PD Fiber 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 use its service to carry, process, or originate robocalls.

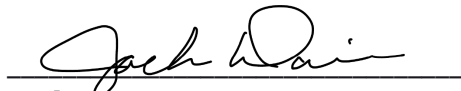
Identifying and Other Information

PD Fiber, LLC, dba Pemiscot Dunklin Fiber of 1240 Riggs St
Kennett, Missouri 63857

- Other business names in use: None
- All business names previously used: None
- PD Fiber is not a foreign voice service provider.
- Affiliates/Subsidiaries: None
- Parent Company: Pemiscot Dunklin Electric Cooperative, Inc.
- OCN: None
- Person within company responsible for addressing robocall mitigation-related issues:

Jack Davis, General Manager
PD Fiber, LLC
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(O) 573-757-6641

I, Jack Davis, General Manager for PD Fiber, LLC, submits this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.



Jack Davis
Feb. 26, 2024

Robocall Mitigation Program

PD Fiber has taken specific reasonable steps, as set forth below, to avoid originating and processing illegal robocall traffic.

As a reseller, PD Fiber 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's 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.

Momentum's call analytics also can detect whether the calling number is invalid, unallocated, or on the Industry Traceback Group's Do Not Originate (DNO) 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 inform Momentum: when the issue is resolved and what actions the wholesale customer took in resolving the issue. If 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.

In its Acceptable Use Policy (or Terms and Conditions, as applicable), PD Fiber prohibits the use of its services in any way that violates federal, state, or local laws or that promotes illegal activity. Under its policy, PD Fiber customers may not use the Company's services to disrupt, or take any action that interferes with, PD Fiber's network or equipment.

Pursuant to our policy, violations may result in a warning and/or suspension or termination of service, as deemed appropriate by PD Fiber. The Company will cooperate with law enforcement investigations of illegal robocall activity.

PD Fiber and Momentum have adopted know-your-customer processes. PD Fiber vets the identity of its subscribers when approving new or renewal applications for service, provisioning network connectivity, and entering into any contract agreements. PD Fiber will confirm the identity of new or renewing residential and business customers by collecting identifying information including, as applicable, SSN, date of birth, contact person for the business, physical address, state and/or country of incorporation, and

federal tax ID. New customers requesting an excessive number of call paths will be screened for legitimate usage needs.

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: approving an application for service; provisioning network connectivity; entering into a contract agreement; or 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.

With respect to know-your-upstream provider processes, Momentum has indicated 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 plans. Momentum confirms that all upstream providers from which it receives traffic are listed in the FCC's Robocall Mitigation Database.

PD Fiber will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.