



24 E. Tioga St.
Spencer, NY 14883
607-589-6235

Haeefe Connect
FRN: 0003775400
Robocall Mitigation Plan
02/21/2024

Statement:

Haeefe Connect relies upon Momentum Telecom, Inc. (Momentum) as Haeefe Connects upstream voice services provider. Consequently, Haeefe Connect depends on the procedures, policies, and safeguards implemented by Momentum to ensure that Haeefe Connects residential and business customers are adequately protected against robocall and spoofing activities.

In conjunction with Momentum Telecoms mitigation efforts, Haeefe Connect has chosen to employ a multi-layered approach to address and mitigate illegal robocalling, and to participate in industry call trace back efforts. Haeefe Connects efforts will include the following:

- Haeefe Connect utilizes the mitigation technique of “Know Your Customer”. Haeefe Connect services primarily small business and residential users who are physically located within the Haeefe Connect service footprint. Haeefe Connect thoroughly vets new residential and small business customers by asking personally identifiable questions for additional security before activating new service or making changes to existing service.
- Specifically, with respect to caller-ID, to require that the caller-ID value be either a number assigned to the calling party, a number which the caller has the explicit permission of the assignee to use, or the verified name of the subscriber or business.
- When non-compliant calls come to our attention, through our own analysis or via Momentum, we shall promptly investigate and take necessary action with the offending customer to mitigate ongoing illegal activity.
- Haeefe Connect shall provide a point-of-contact for traceback and takedown requests from bona fide sources, and respond within twenty-four (24) hours.
- Company abuse mitigation practices shall be applied in a non-discriminatory manner.
- If we discover that traffic originally flagged as illegal is in fact legitimate, we will share that information with other parties in the call chain.
- In partnership with Momentum, Haeefe Connect provides our VoIP customers easy-to-use call blocking and labeling tools at no charge.
- Haeefe Connects VOIP provider Momentum has the following call analytic policies in place as part of their Robocall Mitigation Policies.

Momentum Use of Call Analytics to Identify and Block Unlawful 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 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 ITG'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.

In the event that 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.

Momentum Knowledge of Upstream Providers

Momentum knows all of 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.