

Callabyte Technology, LLC

Robocall Mitigation Certification and Plan

Updated February 2025

Callabyte Technology, LLC (Callabyte), a voice service provider, submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the FCC's rules. Callabyte has taken specific reasonable steps, as set forth below, to avoid originating and processing illegal robocall traffic.

Momentum Telecom, Inc. (Momentum) is Callabyte's underlying voice service provider. Accordingly, Callabyte relies on procedures, policies, and safeguards implemented by Momentum to ensure that Callabyte's residential and business customers are sufficiently protected against robocall and spoofing activities.

STIR/SHAKEN

Callabyte is a voice provider without a STIR/SHAKEN obligation. Our underlying provider has certified to "complete" STIR/SHAKEN implementation.

Enforcement

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

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

Traceback

Callabyte 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. Callabyte 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 Information

Callabyte Technology, LLC of 1313 Cooperative Dr, PO Box 250, Fulton MO 65251

Other business names in use: None

All business names previously used: None

Callabyte is not a foreign voice service provider.

Principals, Affiliates, Subsidiaries, Parent Company: Callabyte Technology, LLC is a subsidiary of Callaway Electric Service Company, LLC, which is a wholly owned subsidiary of Callaway Electric Cooperative.

Organizational Management and Leadership

Callaway Electric Cooperative

- Thomas W. Howard, General Manager/CEO
- Clinton R Smith, Assistant Manager
- Daniel W Slizewski, Manager of Operations
- Lise M Fuller, Manager of Finance & Accounting
- Mark A Voss, Manager of Engineering
- Clay M Carroll, Manager of Member Services
- Stephanie D Laney, Manager of Administration
- Robert E Barnes, Manager of Fiber & Technology Services

Callaway Electric Cooperative Board of Directors

- David J Means, President
- Wesley Zerr, Vice President
- Garnett G Garrett, Secretary
- Brent A Loutzenhiser, Treasurer
- David L Guerrant, Director
- David Boessen, Director
- Anita L Ruga, Director
- Steve G Hotsenpiller, Director
- Cody A Zuroweste, Director

Callaway Electric Service Company

- Thomas W Howard, Registered Agent

Callabyte Technology, LLC Board of Directors

- Thomas W Howard, President
- Clinton R Smith, Vice-President
- Lise M Fuller, Treasurer
- Robert E Barnes, Secretary
- Mark A Voss, Director
- Clay M Carroll, Director
- Stephanie D Laney, Director
- Daniel W Slizewski, Director

OCN: None

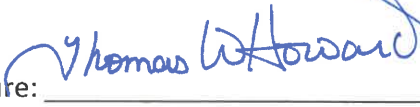
Individual within company responsible for addressing robocall mitigation-related issues:

Robert Barnes, Manager of Fiber & Technology Services

Business address: 1313 Cooperative Dr, PO Box 250, Fulton MO 65251

(P) 573-826-2371; rbarnes@callawayelectric.com

I, Thomas W. Howard, President for, Callabyte Technology, LLC submits this certification on behalf of Callabyte, 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.

Signature:  _____

Title: President

Dated: February 21, 2025

Callabyte Robocall Mitigation Program

Callabyte has implemented know-your-customer and specific reasonable steps, including traffic monitoring, to mitigate the risk of carrying or processing illegal robocalls on behalf of its customers.

As a reseller, Callabyte 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 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 whether the calling number is invalid, unallocated, or on 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 thereafter inform Momentum (i) when the issue is resolved and (ii) 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 Terms and Conditions, Callabyte strictly prohibits the origination of unlawful robocalls on its network. Customer will not use the Service to make illegal robocalls. Our agreements state:

"The prohibition of illegal robocalls includes calls initiated through Callabyte voice services and/or any other voice service provider using the IP connectivity provided by Callabyte. Callabyte will investigate allegations that its network is being used to originate or process illegal robocalls. Should Callabyte become aware of such unlawful activity, it will immediately investigate and take appropriate action. In addition to reporting unlawful robocalls to the appropriate authorities, violations of this policy may result in voice calls being blocked, termination of service(s), and forfeiture of all paid fees.

Callabyte and Momentum have adopted know-your-customer processes. Callabyte vets the identity of its subscribers when approving new or renewal applications for service, provisioning network connectivity, and entering into any contract agreements. Callabyte will confirm the identity of new or renewing business customers by collecting information including a contact person for the business, the physical location of the business, the state and/or country of incorporation, and the federal tax ID. When it installs service, Callabyte reviews caller ID and call records.

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.

With respect to know-your-upstream provider processes, Momentum has provided that it 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.