



**FOUR STATES
FIBER INTERNET**

February 17, 2026

Office of the Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554
Attn: Enforcement Bureau – Telecommunications Consumers Division

Re: WC Docket No. 17-97

Dear Ms. Dortch,

Enclosed is a copy of Southwest Arkansas Telecommunication & Technology, Inc. d/b/a Four States Fiber's Robocall Mitigation Plan and Certification.

If you have further questions or concerns about this matter, please do not hesitate to contact me directly.

Respectfully submitted,

Jacqueline Carver

Vice President of Finance and Administration

Southwest Arkansas Electric Cooperative Corporation

Four States Fiber

Enclosures: Robocall Mitigation Plan and Certification



Four States Fiber

Robocall Mitigation Certification and Plan

February 21, 2024

CERTIFICATION

Pursuant to section 64.6305 of the Federal Communications Commission's ("Commission's") rules, Southwest Arkansas Telecommunications & Technology, Inc. ("Four States Fiber") submits this document addressing its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. Four States Fiber provides high-speed broadband internet and VoIP phone service to business and residential customers and is considered a voice service provider under section 64.6305. Momentum Telecom, Inc. ("Momentum") is Four States Fiber's underlying voice service provider. Four States Fiber relies on procedures, policies, and safeguards implemented by Momentum to ensure that Four States Fiber's residential and business customers are sufficiently protected against illegal robocall and spoofing activities.

Four States Fiber has fully implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. All calls that originate on Four States Fiber's network are subject to the Robocall Mitigation Program set forth below.

Four States Fiber has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

Four States Fiber has 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.

Traceback

Four States Fiber 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. Four States Fiber will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group (ITG), and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate illegal robocalls.



Identifying Information

Primary address of the provider: 2904 E. 9th St., Texarkana, AR 71854

Other business names in use: [None]

All business names previously used: [None]

Four States Fiber is not a foreign voice service provider.

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

Jacqueline Carver, 2904 E. 9th St, Texarkana, AR 71854, (870)772-2743 ext.1203, jcarver@swrea.com

ROBOCALL MITIGATION PLAN

STIR/SHAKEN Implementation

Momentum, Four States Fiber's underlying voice service provider has fully implemented STIR/SHAKEN.

Momentum authenticates Four States Fiber's voice traffic using STIR/SHAKEN, providing A-level

attestation for all of Four States Fiber's calls.

Robocall Mitigation Program

Use of Call Analytics to Identify and Block Unlawful Traffic. In addition to implementing STIR/SHAKEN on its network, Momentum has also implemented its own call analytics to identify unlawful traffic originated by its own retail customers and the end user customers of its wholesale customers, including Four States Fiber. 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 the ITG's Do Not Originate ("DNO") list. If Momentum's call analytics detect any of the above-described issues with the outbound traffic of a Four States Fiber end user customer, Momentum alerts Four States Fiber's contact representative and asks Four States Fiber to investigate the issue and thereafter inform Momentum: (i) when the issue is resolved and (ii) what actions Four States Fiber took in resolving the issue. Upon receipt of any alert from Momentum, Four States Fiber conducts an immediate investigation to determine if the caller was attempting to originate unlawful robocalls. If confirmed, Four States Fiber will take appropriate action in



accordance with its Acceptable Use Policy which may include issuance of a warning to the customer, account suspension, or account termination.

Know-our-Customer. Four States Fiber vets each customer upon application for service, entering new or renewal contracts, and/ or provisioning network connectivity. Four States Fiber confirms the identity of new or renewing business customers by collecting information concerning the company name and address, physical location of the business, contact information, and the customer's Federal Tax ID, where appropriate. With respect to residential customers, Four States Fiber verifies customer name and address, physical service location, and contact information. Four States Fiber may also utilize third-party agencies to gauge credit and/or fraud risk associated with a potential business or residential customer.

Description of Contractual Provisions. Four States Fiber's Terms and Conditions, which must be acknowledged by all customers prior to service initiation, include a provision requiring customers to comply with all applicable laws in connection with the customer's use of Four States Fiber's services. Pursuant to the Terms and Conditions, in order to protect its network from any unlawful use, Four States Fiber may take action, including suspension or termination of service. All customers must also agree to abide by Four States Fiber's Acceptable Use Policy, which prohibits customers from engaging in any activity, whether illegal or not, that Four States Fiber, in its sole discretion, determines to be harmful to its subscribers, operations, or networks. To the extent a customer is found to have violated its contractual obligations, Four States Fiber will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning, suspending or terminating the customer's service, and/or reporting the misconduct to the appropriate authorities.

Know-Your-Upstream Provider. Four States Fiber's sole upstream Provider is Momentum which is registered in the Robocall Mitigation Database and has fully implemented the STIR/SHAKEN framework. Four States Fiber relies on procedures and policies implemented by Momentum to mitigate illegal robocalls. Momentum has confirmed it knows all of its 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 also confirms that all upstream providers from which it receives traffic are listed in the FCC's Robocall Mitigation Database.



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Cooperation with Traceback Group, Law Enforcement, and Government Agencies. Four States Fiber will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and ITG, and will cooperate with such entities in investigating and stopping any robocallers that use its network to originate illegal robocalls. Four States Fiber's underlying voice services provider, Momentum, is also committed to responding fully and within 24 hours to all traceback requests made by ITG, law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated or passed to Momentum. Four States Fiber has agreed to cooperate with Momentum in responding to ITG traceback requests, as detailed above. Four States Fiber and Momentum are committed to fully complying with the Commission's robocall blocking requirements and Momentum has confirmed that it will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITG. Momentum also blocks the traffic of all foreign providers and gateway providers that have not registered in the Robocall Mitigation Database. Four States 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.

Sincerely,

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General Manager