

Gallatin Wireless Internet, LLC

Robocall Mitigation Program

Gallatin Wireless Internet, LLC (“Gallatin”), d/b/a Wispwest, is a non-facilities-based reseller of interconnected VoIP services. It obtains its services from two wholesale sources: Momentum Telecom and Tri-County Telephone Association, Inc., each of whom assigns telephone numbers to Gallatin’s subscribers. Gallatin does not have access to the numbering resource and does not assign telephone numbers to its VoIP users. Gallatin operates exclusively in Montana.

Gallatin complies with the requirement to “know your subscriber.” Gallatin’s services are provided to residents and businesses in southcentral Montana. Gallatin knows its subscribers and their business. Gallatin has a direct contractual relationship with each subscriber. Gallatin knows the location of each subscriber and the number of VoIP lines purchased by this subscriber from Gallatin. Few within its total subscriber base have enough call paths to generate the high volume of traffic associated with robocalling. Given the locations and type of our subscriber base, the chances that ANY of them would originate illegal traffic is low.

Gallatin uses service agreements and acceptable use policies as a means of deterring its new and existing subscribers from using their voice services in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity. These documents governing use of Gallatin’s services include terms indicating specifically to all subscribers that their services should not be used for the purpose of making illegal calls, and Gallatin reserves the right within its service agreements to suspend or terminate a subscriber’s voice service for violating applicable service-related terms.

Gallatin has two upstream (intermediate) service providers. One of these providers, Momentum Telecom, provides the analytics to identify and block illegal traffic. Momentum Telecom is listed in the Robocall Mitigation Database. A copy of its own Robocall Mitigation Program is attached to its filing in the Robocall Mitigation Database. Momentum Telecom’s analytics monitor all of Gallatin’s outbound voice traffic routed through Momentum in real-time to detect and prevent the origination or transit of illegal robocalls. Momentum uses analytics that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Outbound calls from Momentum subscribers, such as Gallatin, using Momentum-Carrier Partner U.S. phone numbers are signed with “A” or full attestation. 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 with Gallatin’s originated traffic, a report is generated that summarizes the issues presented. If Momentum’s analytics report indicates potential illegal robocall activity by a Gallatin subscriber, Momentum will alert Gallatin’s contact representative and asks Gallatin to investigate the issue and thereafter inform Momentum: (i) when the issue is resolved and (ii)

what actions Gallatin took in resolving the issue. We will immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic is likely unlawful, then we will warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we will terminate their service.

The second provider is Tri County Telephone Association, Inc. (FRN 0003744463), which supplies Gallatin with a few of its VoIP access lines. Tri County uses analytics to monitor Gallatin's outbound voice traffic routed through Tri County in real-time to detect and prevent the origination or transit of illegal robocalls. What Tri County does for these few lines is described in Tri County's robocall mitigation filing, which Gallatin incorporates by reference in this filing.

Gallatin's voice service system inherently is incompatible with the use of the service for robocalls. All but a handful of Gallatin's residential voice service subscribers have a single voice path. Of the remainder, a few have two lines which is the maximum number of voice path's Gallatin's modems will support. Gallatin has no customers which receive bulk VoIP service.

Momentum blocks traffic from any non-gateway intermediate provider not listed in the Robocall Mitigation Database as of May 28, 2024.

Gallatin commits to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

At no time during the last two years, neither Gallatin nor any entity for which Gallatin shares common ownership, management, directors, or control has 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 the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

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