

French Broad Electric Membership Corporation
Robocall Mitigation Plan
Date: February 23, 2024

French Broad Electric Membership Corporation (French Broad) utilizes Momentum Telecom, Inc. (Momentum) as its underlying voice services provider. Accordingly, French Broad relies in part on procedures, policies, and safeguards implemented by Momentum to ensure that French Broad's residential and business customers are sufficiently protected against robocall and spoofing activities.

Traceback

French Broad is committed to responding fully and within 24 hours to all traceback requests from the Industry Traceback Group (ITG), law enforcement, and government agencies and cooperates with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Knowledge of Upstream Provider

French Broad knows all of the upstream providers from which it directly receives traffic. French Broad has insight into its upstream providers and procedures related to identifying and blocking unlawful robocall traffic through French Broad's review of this provider's robocall mitigation plan. This document confirms that French Broad's only upstream provider is Momentum, which is listed in the FCC's Robocall Mitigation Database.

STIR/SHAKEN

On behalf of French Broad, Momentum has implemented STIR/SHAKEN on its network where all of French Broad's voice traffic originates. French Broad is not obligated to implement STIR/SHAKEN directly because it lacks control over the network infrastructure necessary for implementation. See First Caller ID Authentication Report and Order, 35 FCC Rcd at 3241, para. 40; 47 CFR Section 64.6304(b). In addition to implementing STIR/SHAKEN on its network, Momentum has adopted a robocall mitigation plan to take its own measures to limit the potential for the originating, carrying, or processing of unlawful robocalls from or on its network which is described below.

Robocall Mitigation Program

Momentum has implemented its own call analytics to monitor French Broad's outbound voice traffic in real time to prevent the origination of illegal robocalls. 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 French Broad, Momentum will alert French Broad's contact representative and ask them to investigate the issue and

thereafter inform Momentum: (i) when the issue is resolved and (ii) what actions were taken to resolve the issue.