

Gateway Fiber Robocall Mitigation Program

Under 47 C.F.R. §64.6305(a), voice service providers are to implement an appropriate robocall mitigation program and under §64.6305(d) certify that all calls that it originates on its network are subject to a robocall mitigation program as defined by the Federal Communications Commission (FCC). Gateway Fiber is a non-facilities-based Voice over IP reseller of VoIP service through Momentum Telecommunications (Momentum). The network that provides voice services is that of Momentum. Momentum provides Gateway Fiber with all of its voice network capability, telephone numbers, software and other services and capabilities that Gateway Fiber offers as resold VoIP service to its broadband fiber customers (end users) in the areas where Gateway Fiber operates its broadband fiber facilities. Gateway Fiber maintains a SIP connection to Momentum which allows for the origination and termination of IP-based voice traffic.

Given its status as a non-facilities-based reseller, an appropriate mitigation plan for Gateway Fiber necessarily must rely upon Momentum's implementation of STIR/SHAKEN, its use of analytics to detect the likelihood of illegal robocalling and its deployment of other network monitoring and response capabilities. Momentum's status in that regard is discussed in its own RMD filings. However, in the event Momentum's analytics indicate the possibility of unlawful traffic originating from any telephone numbers assigned to a Gateway Fiber end user, that information is shared with Gateway Fiber for further investigation and resolution by Gateway Fiber in cooperation with Momentum.

As described here, Gateway Fiber has taken reasonable steps to avoid originating illegal robocall traffic appropriate to its status as a non-facilities-based reseller. Consistent with FCC rules and its contractual arrangements with Momentum, Gateway Fiber commits to respond within 24 hours to all traceback requests from the FCC, law enforcement and the industry traceback consortium, and to cooperate with these entities in investigating and stopping any illegal robocallers that use Gateway Fiber's resold VoIP services to originate such calls.

Gateway Fiber has not had any previous certification removed by FCC action and it has not been prohibited from filing in the Robocall Mitigation Database by the FCC. By virtue of its arrangements with Momentum for VoIP network provisioning, Gateway Fiber certifies that it has implemented the STIR/SHAKEN authentication framework across its voice services "network" and all calls that it originates are compliant with call authentication requirements as reflected in 47 C.F.R. §64.6301(a)(1) and (2).

As required by §64.6304(d)(2), Gateway Fiber did not seek any type of extensions for the implementation of STIR/SHAKEN, as its network provider, Momentum, implemented these capabilities for its wholesale customers, including Gateway Fiber. Also, at no time in the prior two years has Gateway Fiber (and/or any entity that has common ownership, management, directors or control) been subject to a formal FCC, 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.

Finally, in addition to other mitigation measures, Gateway Fiber maintains "Know Your Customer" information about its VoIP end users (new and renewing customers) so that it can exercise due diligence as to whether they are likely to originate illegal robocalls. Specifically, Gateway Fiber vets the identity of its end user customers at several stages in the customer life cycle. At the stage of customer acquisition,

Gateway Fiber collects from its VoIP retail customers their name and address, physical location, contact information as well as additional nature of business and other information from business or enterprise customers. Gateway Fiber may also use third party agencies to assess credit or fraud risk associated with a potential customer. If Gateway Fiber cannot validate the potential customer based on the information provided. Then it will not provide VoIP service to that person or business. And on an ongoing basis, Gateway Fiber maintains customer policies that can be invoked if needed to terminate a customer that originates illegal robocalls.