

United Electric Cooperative Services, Inc.
PO Box 1809, Burleson TX 76097

Robocall Mitigation Plan

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Momentum Telecom, Inc. (Momentum) is United Electric Cooperative Services, Inc.'s, hereafter referred to as 'United', underlying voice services provider. Accordingly, United relies on procedures, policies, and safeguards implemented by Momentum to ensure that United's residential and business customers are sufficiently protected against robocall and spoofing activities.

Traceback

United responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperates with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

On behalf of United, Momentum already authenticates some of the voice traffic using STIR/SHAKEN.

The remainder of the voice traffic that United originates on its network is subject to Momentum's robocall mitigation program described below.

Robocall Mitigation Program

Momentum uses call analytics provided by Sansay, Inc. and TransNexus to monitor United's outbound voice traffic in real time to prevent the origination of illegal robocalls. The software identifies calling patterns that would indicate robocall activity, such as an unusual number of calls from a telephone number and/or an unusual number of short duration or incomplete calls. The software provides detailed reporting identifying suspected illegal robocalls. The software also provides alerts where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. There is an immediate investigation of any identified calls to determine if the caller was attempting to originate unlawful robocalls. If it is determined that the caller was attempting to originate unlawful robocalls, then United either warns them to stop or suspends/terminates their service, as appropriate pursuant to its Acceptable Use Policy.