



Date: 9/21/2021

I certify the following to be true or correct:

-We are exempt of the STIR/SHAKEN requirement as per the exemption received under 47 CFR § 64.6304:

- (a) Small voice service providers.
 - (1) Small voice service providers are exempt from the requirements of § 64.6301 through June 30, 2023.
 - (2) For purposes of this paragraph (a), "small voice service provider" means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider's affiliates).
- (b) Certification and database.
 - (2) A voice service provider that certifies that some or all of the calls that originate on its network are subject to a robocall mitigation program consistent with paragraph (a) of this section shall include the following in its certification:
 - (ii) The specific reasonable steps the voice service provider has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program.
 - (1) We have partnered with Bandwidth for our primary SIP Carrier. Bandwidth actively monitors for fraud calls and alerts us if they identify anything. This includes tools for unlawful call blocking, spam filtering, blacklist filtering (such as the industry-recognized Prism tool), and TN disconnection. Bandwidth provides Full Attestation (A) for all Bandwidth US phone numbers and Partial Attestation (B) for any non-Bandwidth US phone numbers. Momentum is our secondary SIP Carrier supporting some of our customers based in rural areas. Momentum provides Full Attestation (A) for our calls going through their service.
 - (2) We provide our services to local business only that we have a working relationship with and knowledge of their phone usage requirements.
 - (3) We monitor the phone systems to ensure only provided phones are connecting to the systems.
 - (4) We monitor call traffic on the phone systems for issues.
 - (5) We do not allow international calls unless requested by the customer. All international calls are blocked on our phone system.
 - (6) We proactively update our phone systems multiple times a year to keep them up to date.
 - (7) The phone extension passwords are randomly generated or strong passwords that we generated. We periodically check to verify the passwords on the phones have not been changed by the end users.
 - (8) We have the phone systems locked down to only the required ports being open to facilitate SIP traffic.
 - (9) Our phone systems are setup to block IP Address from any illegal login attempts after a period of failed attempts.



- (iii) A statement of the voice service provider's commitment 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.
- (1) Omega Technology Group will respond to any traceback requests from the Federal Communications 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.

Thanks,

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