

Forked Deer Connect, LLC
Robocall Mitigation Certification and Plan

Forked Deer Connect, LLC a voice service provider, submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the FCC's rules. Forked Deer Connect, LLC has taken specific reasonable steps, as set forth below, to avoid originating and processing illegal robocall traffic.

STIR/SHAKEN

Forked Deer Connect, LLC is a voice service provider without a STIR/SHAKEN obligation; Our wholesale Voice Service Provider has certified "Complete" STIR/SHAKEN implementation.

Momentum Telecom, Inc. (Momentum) is Forked Deer Connect LLC's underlying voice service provider. Forked Deer Connect LLC relies on procedures, policies, and safeguards implemented by Momentum to ensure that Forked Deer Connect, LLC's residential and business customers are sufficiently protected against robocall and spoofing activities.

Momentum has fully implemented STIR/SHAKEN implementation; all calls that the Forked Deer Connect, LLC originates are compliant with section 64.6301(a)(1) and (2) of the Commission's rules.

ENFORCEMENT

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan.

Forked Deer Connect, LLC and/or any entity for which the filing entity shares common ownership, management, directors, or control have never 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 transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

Forked Deer Connect, LLC has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

TRACEBACK

Forked Deer Connect, LLC commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. Forked Deer Connect, LLC will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our service to carry, process, or originate robocalls.

IDENTIFYING AND OTHER INFORMATION

Address: 1135 N. Church Street; Halls TN 38040

Other Business Names Currently in Use: FDC

Parent Companies: Forked Deer Electric Cooperative, Inc.

Individual Responsible for Robocall Related Issues:

Crystal Warden

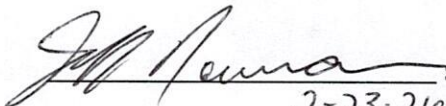
Office Manager

1135 N. Church Street; Halls TN 38040

731-836-1520

crystal.warden@forkeddeer.com

I, Jeff Newman, CEO/General Manager for, Forked Deer Connect, LLC submit this certification on behalf of the Forked Deer Connect, LLC, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury that the information and statements contained herein are true and correct to the best of my knowledge and belief.

 sign/date
2-23-24

Robocall Mitigation Program

Forked Deer Connect, LLC has implemented specific reasonable steps, including traffic monitoring, to mitigate the risk of carrying or processing illegal robocalls on behalf of our customers.

As a reseller, Forked Deer Connect, LLC relies on Momentum's call analytics to monitor call traffic. Momentum has implemented its own call analytics to identify unlawful traffic originated by its retail customers and the end users of its wholesale customers' services. 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 whether the calling number is invalid, unallocated, or on Industry Traceback Group'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. If an analytics report indicates potential illegal robocall activity by a wholesale end user customer, Momentum alerts the wholesale customer's contact representative and asks the customer to investigate the issue and thereafter inform Momentum (i) when the issue is resolved and (ii) what actions the wholesale customer took in resolving the issue. If Momentum's analytics report indicates potential illegal robocall activity by one of its own retail customers, Momentum conducts its own investigation into the customer and the calls at issue.

If the Forked Deer Connect, LLC receives an alert from Momentum, Forked Deer Connect, LLC will act consistent with our Acceptable Use Policy (AUP) and our commensurate with the severity of the customer's offense. Our AUP prohibits utilizing our network for deceptive purposes, engaging in fraudulent or unlawful activities, and violating local, state, or federal laws. The AUP prohibits the origination of unlawful robocalls on our network. Consistent with the AUP, Forked Deer Connect, LLC may provide violators with a warning, terminate the customer's service(s), and/or report the misconduct to the appropriate authorities.

Know-Your-Customer Processes.

Forked Deer Connect, LLC and Momentum have adopted know-your-customer processes. Forked Deer Connect, LLC vets the identity of our subscribers when approving new or renewal applications for Internet and Voice services, provisioning network connectivity, and entering into any contract agreements. Forked Deer Connect, LLC's retail voice customers are in or near the geographic area of our parent electric cooperative. As such, we know our customers – our customers reside in the communities in which we operate in and are electric cooperative members. The vast majority of our end user customers are either residential or single-party business lines. These customers are limited to one call path, thereby minimizing the overall risk of robocalls originating from our customers. We have not received information suggesting that robocalls are likely to originate on our

network. Therefore, we do not consider our network at high risk of originating illegal robocalls.

As part of Forked Deer Connect, LLC's Operating procedure, we conduct due diligence on new or renewing voice customers, by confirming the customer's identity for residential and businesses. Forked Deer Connect, LLC confirms the service address, the customer's identity, and email address of all customers. Forked Deer Connect, LLC verifies customer information when services are renewed or added.

For Business customers, Forked Deer Connect, LLC confirms:

- Contact Person's name, and phone number,
- Physical business location,
- Federal Tax ID, and
- Nature of Business.

Momentum vets the identity of its wholesale customers prior to entering into a contract for VoIP services. Momentum's wholesale customers are expected to vet their end user subscribers consistent with the FCC's robocall mitigation rules. Momentum's wholesale contracts prohibit the use of its services to originate unlawful traffic.

Momentum also vets the identity of the customers to whom it provides retail telephone service when: (i) approving an application for service; (ii) provisioning network connectivity; (iii) entering into a contract agreement; or (iv) granting the right to use telephone number resources. Momentum collects from retail customers their name and address, physical location, contact information, and, for business and enterprise customers, their jurisdiction of incorporation, federal tax ID, and nature of business. Momentum may also utilize third-party agencies to gauge credit and/or fraud risk associated with a potential customer. Momentum's policy is to request additional information from the customer if Momentum cannot validate the customer based on the initial information provided. Momentum will not provide service if a new customer's identification cannot be verified. Through its retail terms of service, Momentum requires its enterprise customers to comply with all applicable laws in relation to its voice services, explicitly prohibiting any abusive or unlawful use of the service.

Know-Your-Upstream Providers. Momentum states that it knows all upstream providers from which it directly receives traffic and has insight into its upstream providers' policies and procedures related to identifying and blocking unlawful robocall traffic through Momentum's review of these providers' robocall mitigation plans. Momentum confirms that all upstream providers from which it receives traffic are listed in the FCC's Robocall Mitigation Database.

Traceback. Forked Deer Connect, LLC will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.

Forked Deer Connect, LLC reserves the right to modify and/or supplement this Robocall Mitigation Plan to adapt to risks and to improve the overall effectiveness of our program.