

GTech Fiber, LLC

ROBOCALL MITIGATION PLAN

GTech Fiber, LLC (“GTech”) is a broadband service provider that offers interconnected VoIP services to its subscribers on a resold basis. GTech’s underlying voice service provider is Momentum Telecom, Inc. (“Momentum”), which is registered in the Robocall Mitigation Database and performs first-party STIR/SHAKEN authentication on calls originated by GTech’s end-user customers.

While GTech necessarily relies on Momentum’s robocall mitigation policies, procedures, and safeguards, GTech has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Momentum or other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: Prior to entering into an agreement to provide telephone service, GTech vets the identity of its customers. As part of this vetting process, the customer provides their legal name, business location, state of incorporation, federal tax ID, and other relevant contact information. GTech visits each location where service will be provided. GTech’s services are installed on location by its personnel, so GTech knows the actual location of its customers. This information enables GTech to validate the identity of potential customers prior to provisioning of service. Service will not be provided if a new customer’s identification cannot be verified.

Contractual Terms: GTech’s terms of service prohibit the use of its voice service for fraudulent or unlawful acts or purposes, including, but not limited to, origination of unlawful robocalls on its network. To the extent a customer is found to have violated GTech’s terms of service, GTech will take action commensurate with the severity of the customer’s offense, including, but not limited to, suspending the customer’s service.

Use of Call Analytics to Identify and Block Unlawful Traffic

GTech relies on Momentum’s use of call analytics systems to identify and block unlawful robocall traffic as set forth in its robocall mitigation plans on file with the FCC. Momentum reports that its call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusual 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, and calling numbers that are invalid, unallocated, or on the Industry Traceback Group’s Do Not Originate (“DNO”) list.

If GTech receives a report or alert from Momentum of suspected unlawful robocall traffic originated by a GTech end user customer, GTech will conduct an investigation and will work internally to identify the party that is potentially originating illegal robocalls. To the extent a customer is found to have violated terms, GTech will take action commensurate with the severity of the customer’s offense, including, but not limited to, providing the customer with a warning or terminating the customer’s service.

Knowledge of Upstream Provider

GTech's sole upstream provider, Momentum, is a well-known, reputable voice service provider that is registered in the FCC's Robocall Mitigation Database. GTech does not itself have knowledge or insight into the upstream providers from which Momentum receives traffic, but understands from its mitigation plan that its direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

GTech is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by GTech customers.

GTech is also committed to cooperating with its wholesale provider on traceback requests and to fully complying with the Commission's robocall blocking requirements. GTech understands that Momentum will block calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commissions; or (3) include a caller ID number or name that is on the DNO list issued by the ITG.