

Robocall Mitigation Certificate

Robocall Mitigation Program

Date	On behalf of	FRN
March 1, 2026	Velocity Broadband Internet, Inc. DBA Velocity Fusion	0020070504

Filing: Made by Velocity Broadband Internet, Inc. on behalf of itself in compliance with 47 CFR 64.6305.

Specific reasonable steps Velocity Broadband Internet, Inc. has taken to avoid carrying or processing illegal robocall traffic:

Velocity Broadband Internet, Inc. has taken significant steps to avoid carrying or processing illegal traffic serving as a voice service provider for its customers.

The vast majority of Velocity Broadband Internet, Inc. call traffic originates and terminates domestically and wholesale voice services are not offered.

Velocity Broadband Internet, Inc. uses reasonable analytics, and employs a rigorous process for manually blocking calls originating on its network that are suspected to be spam, robocalls, or otherwise fraudulent in its role as a voice service provider.

Velocity Broadband Internet, Inc. also has several line-specific features which can assist customers with blocking unwanted calls.

These include:

- *Anonymous Call Rejection by which an incoming call will automatically be blocked if the caller has blocked the Caller ID – i.e., blocked the display of the originating number. This feature is automatically activated without charge on customer lines and may be deactivated by the customer using their web portal.*
- *Selective Call Acceptance which permits a customer to create a list of numbers that they will accept calls from. This feature is free of charge and is accessible directly from the customer's web portal.*
- *Selective Call Rejection by which a customer can block calls from a specific number. This feature is free of charge and is accessible directly from the customer's web portal.*

Consumers who need additional assistance, may call 800-280-4935.

Velocity Broadband Internet, Inc. has implemented STIR/SHAKEN technology solutions on the IP portions of its network and met the FCC deadline for registration in the Robocall Mitigation Database.

II. General Prohibition Against Illegal Robocalling

Velocity Broadband Internet, Inc's end-user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service ("TOS") requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

Robocall Mitigation Policy

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the Velocity Broadband Internet, Inc. service to engage in or in connection with fraudulent activities

In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

Velocity Broadband Internet, Inc.'s end users are notified that Velocity Broadband Internet, Inc. may take action up to suspension or termination of service for violation of the TOS.

III. Know Your Customer

Velocity Broadband Internet, Inc. utilizes the mitigation technique of "Know Your Customer." Velocity Broadband Internet, Inc. is a small long established provider that maintains a close relationship with its subscribers. Its customers are generally "mom and pop" users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Velocity Broadband Internet, Inc. has set a call path level based on its average customer size. The level – referred to as "large volume calling capability" – is subject to change.

Velocity Broadband Internet, Inc. has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- A Velocity Broadband Internet, Inc. representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

Velocity Broadband Internet, Inc. serves a small number of long-time business end users with large volume calling capability that are being directly contacted to review with them Velocity Broadband Internet, Inc.'s policies and efforts to prevent the Velocity Broadband Internet, Inc. network from being used for illegal robocalling.

IV. Network Monitoring

Velocity Broadband Internet, Inc. uses third-party software in-house that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capability is being added to the software which will automatically disable any subscribers associated with flagged call patterns.

Robocall Mitigation Policy

V. Traceback and Enforcement Cooperation

Velocity Broadband Internet, Inc. will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Velocity Broadband Internet, Inc. will dedicate sufficient resources to provide prompt and complete responses to traceback requests.