

Volt Broadband, LLC  
Robocall Mitigation Plan  
Date: February 27, 2025

Momentum Telecom, Inc. (“Momentum”) is Volt Broadband, LLC’s (“Volt Broadband”) underlying voice services provider. Accordingly, Volt Broadband relies on procedures, policies, and safeguards implemented by Momentum to ensure that Volt Broadband’s residential and business customers are sufficiently protected against robocall and spoofing activities.

### Traceback

Volt Broadband 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.

### STIR/SHAKEN

Volt Broadband is a voice service provider without a STIR/SHAKEN obligation serving end-users.

Momentum Telecom, Inc. (Momentum), Volt Broadband’s underlying voice service provider has certified “Complete STIR/SHAKEN Implementation.” Volt Broadband relies on procedures, policies, and safeguards implemented by Momentum to ensure that Volt Broadband’s residential and business customers are sufficiently protected against robocall and spoofing activities.

### Robocall Mitigation Program

Momentum uses call analytics provided by Sansay, Inc. and TransNexus to monitor Volt Broadband’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 Volt Broadband either warns them to stop or terminates their service, as appropriate pursuant to its Acceptable Use Policy.