

Robocall Mitigation Certification and Plan Fiber by Central Florida, LLC

Fiber by Central Florida, LLC (Central Florida or Company), a voice service provider, submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the FCC's rules.

STIR/SHAKEN

Central Florida is a voice service provider with a STIR/SHAKEN obligation serving end-users.

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

Central Florida is a voice provider without STIR/SHAKEN obligation; our underlying voice provider has certified "Complete" STIR/SHAKEN implementation."

ENFORCEMENT

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

Central Florida 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.

Central Florida has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

TRACEBACK

Central Florida 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. Central Florida 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: PO Box  69, Chiefland FL 32644

Other Business Names Currently in Use:

Other Business Names Previously Used:

Principals: Central Florida Cooperative, Inc.

Affiliates:

Subsidiaries:

Parent Companies:

OCN: None

Individual Responsible for Robocall Related Issues:

Robert Krefting
VP Finance and Accounting
Finance & Accounting Department
(Phone): 352-493-6910; (E-mail): RKREFTING@CFEC.COM

I, Robert Krefting, VP Finance and Accounting, for Fiber by Central Florida, LLC submit this certification on behalf of the Company, 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.

____Robert Krefting 3/4/2025_____ sign/date

Robocall Mitigation Program

PGEG is committed to protecting our customers against illegal robocalls on our network. As detailed below, Central Florida has taken specific reasonable steps to avoid, the origination, carrying, or processing of illegal robocall traffic. Central Florida 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.

Central Florida has implemented know-your-customer and specific reasonable steps, including traffic monitoring, to mitigate the risk of carrying or processing illegal robocalls on behalf of our customers.

As a reseller, Central Florida 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 Company receives an alert from Momentum, Central Florida will act consistent with our Acceptable Use Policy (AUP) and our commensurate with the severity of the customer's offense. The AUP expressly prohibits utilizing our network for deceptive purposes, engaging in fraudulent or unlawful activities, and violating local, state, or federal laws. In the Company's [AUP and "Terms and Conditions,"] Central Florida strictly prohibits the origination of unlawful robocalls on our network. Consistent with our AUP, Central Florida may warn violators, terminate their service, and/or report the misconduct to the appropriate authorities.

Know-Your-Customer Processes. Central Florida and Momentum have adopted know-your-customer processes. Central Florida vets the identity of our subscribers when approving new or renewal applications for service, provisioning network connectivity, and entering into any contract agreements. Central Florida will confirm the identity of new or renewing business customers by collecting information, including a contact person for the business, the physical location of the business, the state and/or country of incorporation, and the federal tax ID. When it installs service, Central Florida reviews caller ID and call records.

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.

Central Florida undertakes reasonable, good faith efforts to vet the identity of our subscribers when approving new or renewal applications for service, provisioning network connectivity, and entering into contract agreements. Central Florida will confirm the identity of new or renewing business customers by collecting identifying information including, as applicable, SSN, date of birth, contact person for the business, physical address, state and/or country of incorporation, and federal tax ID including a contact person for the business, the physical location of the business, the state and/or country of incorporation, and the federal tax ID. When it installs service, Central Florida reviews caller ID and call records.

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. Central Florida 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.