



Voice Service Provider Certification

As a voice service provider, Rapid Fiber hereby certifies all calls originated on Rapid Fiber's network are subject to a federally compliant robocall mitigation program, that any prior certification has not been removed by Commission action, and that Rapid Fiber has not been prohibited from filing in the Robocall Mitigation Database by the Commission. Furthermore, Rapid Fiber certifies that it has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with federal regulations.

Rapid Fiber has developed its own or can rely on Momentum Telecom, Inc., its wholesale VoIP provider, for various processes or measures, which are outlined in its Robocall Mitigation Plan, to avoid originating illegal robocall traffic. Rapid Fiber and Momentum have both established policies to ensure that they vet each other and all customers either company may accept. Additionally, Momentum has adopted its own call analytics to identify unlawful traffic originated on its and Rapid Fiber's network. The two dedicated partners have also committed to working cooperatively together to identify and resolve robocalling activity.

Rapid Fiber certifies that it is committed to respond fully and in a timely manner, within 24 hours whenever possible, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers who use Rapid Fiber's service to originate such calls.

Rapid Fiber (and any entity for which Rapid Fiber shares common ownership, management, directors, or control) has 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 Rapid Fiber transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Information Required by § 64.6305(d)(4)

Business Name: Rapid Fiber Internet, LLC

Primary Address: 11340 100th Street, Suite B, Live Oak, FL 32060

Mailing Address: P.O. Box 1543, Live Oak, FL 32064

Other Business Names: None

**Rapid Fiber Internet is a wholly owned subsidiary of Suwannee Valley Electric Cooperative, Inc.*

Foreign Voice Service Provider: No

Name and Information for Employee Responsible for Robocall Mitigation Issues:

Crystal M. Ecker, General Counsel

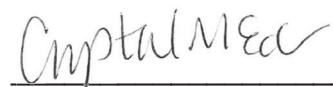
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Live Oak, FL 32060

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legalnotices@rapid-fiber.com

A handwritten signature in cursive script that reads "Crystal M Ecker".

Crystal M. Ecker, General Counsel



Robocall Mitigation Program

Rapid Fiber relies on its partner Momentum Telecom, Inc., its wholesale VoIP provider, for a large portion of its robocall mitigation efforts. Momentum has adopted its own robocall mitigation plan, which has been filed with the Federal Communication Commission (FCC), whereby it certified that it has fully implemented STIR/SHAKEN and taken additional “measures to limit the potential for the originating, carrying, or processing of unlawful robocalls from or on its network.” In addition to Momentum’s measures, Rapid Fiber has developed its own program, outlined in this document.

STIR/SHAKEN

Momentum has fully implemented STIR/SHAKEN. Accordingly, Momentum authenticates Rapid Fiber’s voice traffic using STIR/SHAKEN, providing A-level attestation for all of Rapid Fiber’s calls.

Know-Your-Partner Practices

As dedicated partners, Rapid Fiber and Momentum share in this responsibility: Momentum knows its wholesale customers, and Rapid Fiber knows its upstream provider. This ensures that each company is comfortable with and has fully vetted the other.

According to Momentum’s Robocall Mitigation Plan, it vets the identity of wholesale customers prior to VoIP partnership by collecting relevant information to determine the credit and/or fraud risk the potential wholesale customer may pose. Momentum refuses to partner with any wholesale customer whose identification cannot be verified. Similarly, prior to partnering with Momentum, Rapid Fiber conducted a thorough examination of Momentum by researching its business history and reference checking with other rural cooperative-backed ISPs.

Know-Our-Customer Process

Similar to Momentum’s vetting process for wholesale customers, Rapid Fiber vets each and every end-user customer at various stages: upon application for VoIP service, at the time of contract renewal, and when provisioning network connectivity. Rapid Fiber collects relevant information for each potential end-user customer, whether business or residential, and utilizes that information to ensure the potential customer does not pose an undue risk. Rapid Fiber will not provide service to any end-user customer whose identification cannot be verified or who, in Rapid Fiber’s sole discretion, poses an increased risk to Rapid Fiber’s robocall mitigation efforts. Additionally, Rapid Fiber requires that any VoIP services be in the name of the account owner so that the Caller ID data is accurate. As such, any request to utilize a different name for a VoIP service, including d/b/a, must and will be denied. This is an additional safeguard for minimizing

robocall activity or, in the alternative, providing timely and precise reference to the robocaller.

Use of Call Analytics to Identify and Block Unlawful Traffic

Momentum, as the wholesale voice provider, has implemented its own call analytics that allow it to identify unlawful traffic originated by the end users of its wholesale customers' services, including Rapid Fiber's customers. These call analytics are articulated in Momentum's Robocall Mitigation Plan. Any time these call analytics suggest potential illegal robocall activity by an end-user Rapid Fiber customer, Momentum will alert Rapid Fiber's contact representative. Rapid Fiber will then investigate the issue and take appropriate corrective action commensurate with the severity of the offense. This may include providing the offending customer with a warning, suspending or terminating the customer's service, and/or reporting the offending conduct and customer to the appropriate authorities.

Precautions Contained in Rapid Fiber's Terms of Use

In addition to the measures employed by Rapid Fiber and its partner Momentum, Rapid Fiber requires that its customers comply with all applicable laws implicated by their use of Rapid Fiber's services. Rapid Fiber's "Terms of Service," which include both Rapid Fiber's Service Agreement and Acceptable Use Policy, prohibit using Rapid Fiber's services in any unlawful way. In order to accept and use Rapid Fiber's services, customers must first acknowledge and accept these Terms of Service. As such, customers are directly prohibited by Rapid Fiber from engaging in conduct or activities deemed harmful by Rapid Fiber—this includes robocalling. Should a customer engage in any conduct or activity deemed by Rapid Fiber to be harmful (e.g., robocalling), Rapid Fiber has a range of resolutions designed to correct the harmful behavior, including termination of the service.

Traceback Plan

Rapid Fiber will respond and cooperate fully and in a timely manner to all traceback requests received from the Commission, law enforcement, and the industry traceback consortium to investigate and cease any robocallers that use Rapid Fiber's network to originate unlawful robocalls. Momentum has made a similar pledge in its Robocall Mitigation Plan.

Emergency and Public Safety Calls

In accordance with § 64.6305(g)(5), Rapid Fiber will not block a voice call under any circumstances if the call is an emergency call placed to 911, and Rapid Fiber will make all reasonable efforts to ensure that it does not block any calls from public safety answering points and government emergency numbers.

**Rapid Fiber reserves the right to modify and/or supplement this Robocall Mitigation Plan to adapt to risks and improve the overall effectiveness of its program.*