

Archtop Fiber LLC
Robocall Mitigation Certification and Plan
February 23, 2024

CERTIFICATION

Pursuant to section 64.6305 of the Federal Communications Commission's ("Commission's") rules, Archtop Fiber LLC ("Archtop") submits this document addressing its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls.

Archtop is launching fiber to the premises high speed internet and VoIP phone service to business and residential customers. Momentum Telecom, Inc. ("Momentum") is Archtop's underlying voice service provider. Archtop relies on procedures, policies, and safeguards implemented by Momentum to ensure that Archtop's residential and business customers are sufficiently protected against robocall and spoofing activities.

Archtop has fully implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database.

All calls that originate on our network are subject to the Robocall Mitigation Program set forth below.

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

Archtop 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 transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

Traceback

Archtop is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Archtop will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group (ITG), and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate illegal robocalls.

Identifying Information

Primary address of the provider: 300 Enterprise Drive, Kingston, NY 10412

Other business names in use: None

All business names previously used: None

Archtop is not a foreign voice service provider.

Individual within company responsible for addressing robocall mitigation-related issues:

Alex J. Harris, Vice President - Network & Systems Planning
300 Enterprise Drive, Kingston, NY 10412
203-313-2579
aharris@archtopfiber.com

ROBOCALL MITIGATION PLAN

STIR/SHAKEN Implementation

Momentum, Archtop's underlying voice service provider has fully implemented STIR/SHAKEN. Momentum authenticates Archtop's voice traffic using STIR/SHAKEN, providing A-level attestation for all of Archtop's calls.

Robocall Mitigation Program

Use of Call Analytics to Identify and Block Unlawful Traffic. In addition to implementing STIR/SHAKEN on its network, Momentum has also implemented its own call analytics to identify unlawful traffic originated by its own retail customers

and the end user customers of its wholesale customers, including Archtop. 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 where the calling number is invalid, unallocated, or on the ITG's Do Not Originate ("DNO") list. If Momentum's call analytics detect any of the above-described issues with the outbound traffic of a Archtop end user customer, Momentum alerts Archtop's contact representative and asks Archtop to investigate the issue and thereafter inform Momentum: (i) when the issue is resolved and (ii) what actions Archtop took in resolving the issue. Upon receipt of any alert from Momentum, Archtop conducts an immediate investigation to determine if the caller was attempting to originate unlawful robocalls. If confirmed, Archtop will take appropriate action in accordance with its Acceptable Use Policy which may include issuance of a warning to the customer, account suspension, or account termination.

Know-our-Customer. Archtop vets each customer upon application for service, entering new or renewal contracts, and/or provisioning network connectivity. Archtop confirms the identity of new or renewing business customers by collecting information concerning the company name and address, physical location of the business, contact information, and the customer's Federal Tax ID, where appropriate. With respect to residential customers, Archtop verifies customer name and address, physical service location, and contact information. Archtop may also utilize third-party agencies to gauge credit and/or fraud risk associated with a potential business or residential customer.

Description of Contractual Provisions. Archtop's Terms and Conditions, which must be acknowledged by all customers prior to service initiation, include a provision requiring customers to comply with all applicable laws in connection with the customer's use of Archtop's services. Pursuant to the Terms and Conditions, in order to protect its network from any unlawful use, Archtop may take action, including suspension or termination of service. All customers must also agree to abide by Archtop's Acceptable Use Policy, which prohibits customers from engaging in any activity, whether illegal or not, that Archtop, in its sole discretion, determines to be harmful to its subscribers, operations, or networks. To the extent a customer is found to have violated its contractual obligations, Archtop will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning, suspending or terminating the customer's service, and/or reporting the misconduct to the appropriate authorities.

Know-Your-Upstream Provider. Archtop's sole upstream Provider is Momentum which is registered in the Robocall Mitigation Database and has fully implemented the STIR/SHAKEN framework. Archtop relies on procedures and policies implemented by Momentum to mitigate illegal robocalls.

Momentum has confirmed it knows all of its 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 also confirms that all upstream providers from which it receives traffic are listed in the FCC's Robocall Mitigation Database.

Cooperation with Traceback Group, Law Enforcement and Government Agencies. Archtop will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and ITG, and will cooperate with such entities in investigating and stopping any robocallers that use its network to originate illegal robocalls.

Archtop's underlying voice services provider, Momentum, is also committed to responding fully and within 24 hours to all traceback requests made by ITG, law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated or passed to Momentum. Archtop has agreed to cooperate with Momentum in responding to ITG traceback requests, as detailed above.

Archtop and Momentum are committed to fully complying with the Commission's robocall blocking requirements and Momentum has confirmed that it will block all 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 Commission; or (3) include a caller ID number or name that is on DNO list issued by ITG. Momentum also blocks the traffic of all foreign providers and gateway providers that have not registered in the Robocall Mitigation Database.

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