

Omni Fiber Robocall Mitigation Plan

As part of its Robocall Mitigation Database filing required under the FCC's *Sixth Caller ID Authentication Report and Order* (Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (Mar. 17, 2023)), this document describes Omni Fiber's robocall mitigation plan.

Omni Fiber's Corporate Information

Omni Fiber, LLC is an Ohio corporation. Its primary address is provided within the Robocall Mitigation Database.

Omni Fiber certifies it has not been prohibited from filing in the Robocall Mitigation Database and Omni Fiber has not been subject to any Commission, law enforcement, or regulatory agency action or investigation arising from suspected robocalling or spoofing.

In accordance with 47 § 64.6305(e), Omni Fiber has designated a point of contact to receive notice of any illegal robocall traffic or other robocall mitigation-related issues. That person's name, title, address, phone number, and email address are available within the Robocall Mitigation Database.

STIR/SHAKEN Certification Exemption

Omni Fiber is a reseller that lacks control over the facilities to implement STIR/SHAKEN and therefore is excluded per FCC 20-42 paragraph 40 which states that "the rules we adopt today do not apply to providers that lack the control of the network infrastructure necessary to implement STIR/SHAKEN".

Know-Your-Upstream-Provider Procedures

Omni Fiber has existing agreements with upstream service providers Alianza, Inc. and Sinch America (doing business as Sinch Voice, Inteliquent and Onvoy). Omni Fiber has confirmed that both of these carriers have implemented STIR/SHAKEN and are listed in the Robocall Mitigation Database. As a reseller Omni Fiber is reliant on the procedures in place at the upstream providers.

Alianza has confirmed per its RMD filing that each of its Tier-1 carrier service providers from which it facilitates the provision of carrier services are also listed in the RMD.

Inteliquent has made meaningful investments to implement network upgrades and offer new features in order to combat carrying or processing illegal robocalls. Inteliquent deploys multiple systems to detect potential robocall activity based on statistics such as average call duration, Answer Seize Ratio ("ASR") and call count carrier/consumer reports.

Contractual Terms and Other Conditions

Omni Fiber's customer agreement contains a prohibited uses policy that prohibits activities including, but not limited to, any autodialing, continuous or extensive call forwarding, continuous connectivity, fax broadcast, fax blasting, and telemarketing. Violation of the agreement allows for Omni Fiber to terminate services.

Responding to Commission, Law Enforcement, and Industry Traceback Group

Omni Fiber will respond to all traceback requests from the Commission, law enforcement and the Industry Traceback Group within 24 hours and will cooperate with such entities in investigation and stopping any illegal robocallers that attempt to use Omni Fiber's network to carry or process calls.