

TVEC Connect, LLC
Robocall Mitigation Certification and Plan
August 1, 2024

CERTIFICATION

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

TVEC Connect provides high speed broadband internet and VoIP phone service to business and residential customers and is considered a voice service provider under section 64.6305. Momentum Telecom, Inc. ("Momentum") is TVEC Connect's underlying voice service provider. TVEC Connect relies on procedures, policies, and safeguards implemented by Momentum to ensure that TVEC Connect's residential and business customers are sufficiently protected against illegal robocall and spoofing activities.

TVEC Connect has fully implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database

All calls that originate on TVEC Connect's network are subject to the Robocall Mitigation Program set forth below.

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

TVEC Connect 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

TVEC Connect 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. TVEC Connect 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: 590 Florence Rd., Savannah, TN 38372

Other business names in use: [None]

All business names previously used: [None]

TVEC Connect is not a foreign voice service provider.

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

Richard J. Foster, 590 Florence Rd., Savannah, TN 38372, 7319254916, noc-support@tveconnect.com

ROBOCALL MITIGATION PLAN

STIR/SHAKEN Implementation

Momentum, TVEC Connect's underlying voice service provider has fully implemented STIR/SHAKEN. Momentum authenticates TVEC Connect's voice traffic using STIR/SHAKEN, providing A-level attestation for all of TVEC Connect'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 TVEC Connect. 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 TVEC Connect end user customer, Momentum alerts TVEC Connect's contact representative and asks TVEC Connect to investigate the issue and thereafter inform Momentum: (i) when the issue is resolved and (ii) what actions TVEC Connect took in resolving the issue. Upon receipt of any alert from Momentum, TVEC Connect conducts an immediate investigation to determine if the caller was attempting to originate unlawful robocalls. If confirmed TVEC Connect 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 TVEC Connect vets each customer upon application for service, entering new or renewal contracts, and/or provisioning network connectivity. TVEC Connect 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, TVEC Connect verifies customer name and address, physical service location, and contact information. TVEC Connect 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. TVEC Connect'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 TVEC Connect's services. Pursuant to the Terms and Conditions, in order to protect its network from any unlawful use, TVEC Connect may take action, including suspension or termination of service. All customers must also agree to abide by TVEC Connect's Acceptable Use Policy, which prohibits customers from engaging in any activity, whether illegal or not, that TVEC Connect 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, TVEC Connect 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. TVEC Connect's sole upstream Provider is Momentum which is registered in the Robocall Mitigation Database and has fully implemented the STIR/SHAKEN framework. TVEC Connect 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. TVEC Connect 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.

TVEC Connect'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. TVEC Connect has agreed to cooperate with Momentum in responding to ITG traceback requests, as detailed above.

TVEC Connect 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.

TVEC Connect 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.