

Jackson County REMC Robocall Mitigation Program

STIR/SHAKEN Implementation

Jackson County REMC (or “Company”) operates as a voice service provider with a STIR/SHAKEN obligation, delivering services to end-users. To fulfill this commitment, Jackson County REMC utilizes Momentum Telecom Inc. (Momentum) as its underlying service provider. The Company relies on Momentum’s established procedures, policies, and safeguards to ensure robust protection for its end-users against robocall and spoofing activities.

Momentum has successfully implemented STIR/SHAKEN technology across its network, ensuring that all calls originated by Jackson County REMC comply with the requirements set forth in Section 64.6301(a)(1) and (2) of the Commission’s rules.

ROBOCALL MITIGATION

Background

The FCC Order mandates that a Robocall Mitigation Plan for voice service providers include the following key obligations:

- Detail the reasonable measures implemented by the Company to prevent the origination of illegal robocall traffic.
- Commit to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Consortium within 24 hours, as well as to collaborating with these entities to investigate and stop illegal robocallers utilizing the Company’s services to originate calls.
- Establish and follow Know Your Customer (KYC) procedures.
- Provide a description of any call analytics systems employed to detect and block illegal traffic.

Traceback

Jackson County REMC is dedicated to preventing its network from being used to originate or terminate illegal robocalls. The Company pledges to fully respond to all traceback requests from the Commission, law enforcement agencies, and the industry traceback consortium within 24 hours. Furthermore, it is committed to cooperating with these entities to investigate and halt any illegal robocall activities utilizing its services to originate, process, or carry calls.

Jackson County REMC provides the following name, title, email address for the individual responsible for handling robocall mitigation efforts and responding to traceback requests from the FCC, ITG, and law enforcement:

Traceback Contact Information

Name	Title	Email address
Ben Conner	Vice President of IT	bconner@jacksonremc.com

Call Blocking/Analytics for Monitoring Traffic:

As a reseller, Jackson County REMC leverages Momentum's call analytics to monitor call traffic. Momentum employs advanced analytics to identify unlawful activity originating from its retail customers or the end users of its wholesale customers. These analytics detect patterns indicative of robocall activity, such as an unusually high volume of calls from a single number, an excessive number of short-duration calls, or calls that disconnect after just one ring. Additionally, the system flags calls originating from numbers that are invalid, unallocated, or included on the Industry Traceback Group's Do Not Originate (DNO) list.

When Momentum's analytics identify such issues, a detailed internal report is generated, outlining the specific concerns and the wholesale or retail customer responsible for the calls. If the report suggests potential illegal robocall activity by a wholesale customer's end user, Momentum notifies the wholesale customer's designated contact, requesting an investigation into the issue and requiring updates on (1) resolution of the issue and (2) the steps taken to address it. For potential illegal activity involving Momentum's retail customers, the company conducts its own investigation into the calls and the customer involved.

If Jackson County REMC receives a notification from Momentum, it will respond in accordance with its Acceptable Use Policy (AUP). The AUP strictly prohibits using the network for deceptive purposes, fraudulent or unlawful activities, or violations of local, state, or federal laws. The Company may issue warnings, terminate services for violators, and/or report the misconduct to the appropriate authorities.

Know Your Customer Protocols

Jackson County REMC has implemented proactive and effective measures to prevent both new and renewing customers from using its network to originate illegal robocalls. These measures include conducting thorough due diligence and ensuring that its services are not misused for such activities. As part of this process, the Company verifies the identity of new and renewing customers by collecting key identifying details, such as Social Security Number (SSN), date of birth, business contact information, physical location of the business, state or country of incorporation, and federal Tax ID, as applicable. Additionally, the Company monitors caller ID information and call records once service is operational.

Momentum similarly performs comprehensive vetting of its wholesale customers prior to finalizing contracts for VoIP services. Wholesale customers are required to adhere to the FCC's robocall mitigation rules by thoroughly vetting their end-user subscribers. Furthermore, Momentum's wholesale contracts explicitly prohibit the use of its services for originating unlawful traffic.

Know Your Uptstream Providers:

Momentum affirms that it is fully aware of all upstream providers from which it directly receives traffic and has evaluated their policies and procedures for identifying and blocking unlawful robocall traffic

through a thorough review of their robocall mitigation plans. Additionally, Momentum verifies that all upstream providers it works with are registered in the FCC's Robocall Mitigation Database.

Acceptable Use Policy

The Company includes specific terms and conditions in its customer contracts to clarify the intended and permissible uses of our services. These provisions are designed to help customers understand proper usage while safeguarding against exploitation, fraud, and abuse of our calling plans and features. As part of the terms, the Company reserves the right to pause, suspend, or otherwise terminate service for any customer engaged in illegal activities, including the generation of unlawful robocalls.

Conclusion

The Company submits this Robocall Mitigation Program in accordance with FCC Regulations, 47 C.F.R. §64.6305 (a)(1) & (d)(5). Jackson County will ensure that any updates to the required information, including its Robocall Mitigation Program, are reflected in the RMD within 10 business days of any changes.