

El Reno Robocall Mitigation Certification and Plan

El Reno Municipal Authority d/b/a El Reno Fast Connect (El Reno or Company), a voice service provider, submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the FCC's rules.

STIR/SHAKEN

El Reno is a voice service provider without a STIR/SHAKEN obligation serving end-users. Momentum Telecom, Inc. (Momentum) is El Reno's underlying voice service provider. El Reno relies on procedures, policies, and safeguards implemented by Momentum to ensure that El Reno's residential and business customers are sufficiently protected against robocall and spoofing activities. In its Robocall Mitigation Database filing, Momentum states that it has fully implemented STIR/SHAKEN.

ENFORCEMENT

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan.

El Reno and/or any entity for which the filing entity shares common ownership, management, directors, or control have 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.

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

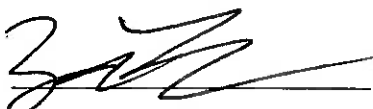
TRACEBACK

El Reno commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. El Reno will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our service to carry, process, or originate robocalls.

IDENTIFYING AND OTHER INFORMATION

- Primary address of the provider: 101 N Choctaw Ave. El Reno, OK 73036
- Other business names in use by the provider: El Reno Fast Connect
- All business names previously used by the provider: N/A
- El Reno is not a foreign voice service provider.
- OCN: N/A
- Person within the company responsible for addressing robocall mitigation-related issues:
Zachary McLemore, Technology Services Director, Broadband Dept.
101 N Choctaw Ave. El Reno, OK 73036
405-262-4070 x1101; zmclemore@elrenook.gov

I, Zachary McLemore, Technology Services Director, for El Reno submit this certification on behalf of the El Reno, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.

 11/19/2025
sign/date

Robocall Mitigation Program

El Reno has taken specific reasonable steps, as set forth below, to avoid originating and processing illegal robocall traffic.

As a reseller, El Reno relies on Momentum's call analytics to monitor call traffic. Momentum has implemented its own call analytics to identify unlawful traffic originated by its retail customers and the end users of its wholesale customers' services. 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 whether the calling number is invalid, unallocated, or on Industry Traceback Group's Do Not Originate (DNO) list.

If Momentum's call analytics detect any of the above-described issues, an internal report is generated that summarizes the issues presented and the applicable wholesale or retail customer that is responsible for the underlying calls. If an analytics report indicates potential illegal robocall activity by a wholesale end user customer, Momentum alerts the wholesale customer's contact representative and asks the customer to investigate the issue and thereafter inform Momentum (i) when the issue is resolved and (ii) what actions the wholesale customer took in resolving the issue. If Momentum's analytics report indicates potential illegal robocall activity by one of its own retail customers, Momentum conducts its own investigation into the customer and the calls at issue.

If the Company receives an alert from Momentum, El Reno will act consistent with our Acceptable Use Policy (AUP) and our commensurate with the severity of the customer's offense. Our AUP prohibits utilizing our network for deceptive purposes, engaging in fraudulent or unlawful activities, violating local, state, or federal laws, and the origination of unlawful robocalls on our network. Consistent with the AUP, El Reno may provide violators with a warning, terminate the customer's service(s), and/or report the misconduct to the appropriate authorities.

Know-Your-Customer Processes.

El Reno and Momentum have adopted know-your-customer processes. El Reno vets the identity of our subscribers when approving new or renewal applications for Internet and Voice services, provisioning network connectivity, and entering into any contract agreements. El Reno's retail voice customers are in or near the geographic area of our parent electric cooperative. As such, we know our customers – our customers reside in the communities in which we operate in and are electric cooperative members. The vast majority of our end-user customers are either residential or single-party business lines. These customers are limited to one call path, thereby minimizing the overall risk of robocalls originating from our customers. We have not received information suggesting that robocalls are likely to originate on our network. Therefore, we do not consider our network at high risk of originating illegal robocalls.

As part of El Reno's Operating Procedures, we conduct due diligence on new or renewing voice customers, by confirming the customer's identity for residential and businesses. El Reno confirms the service address, the customer's identity, and email address of all customers. El Reno verifies customer information when services are renewed or added.

For Business customers, El Reno confirms:

- Contact Person's name, and phone number,
- Physical business location,

- Federal Tax ID, and
- Nature of Business.

Momentum vets the identity of its wholesale customers prior to entering into a contract for VoIP services. Momentum's wholesale customers are expected to vet their end user subscribers consistent with the FCC's robocall mitigation rules. Momentum's wholesale contracts prohibit the use of its services to originate unlawful traffic.

Momentum also vets the identity of the customers to whom it provides retail telephone service when: (i) approving an application for service; (ii) provisioning network connectivity; (iii) entering into a contract agreement; or (iv) granting the right to use telephone number resources. Momentum collects from retail customers their name and address, physical location, contact information, and, for business and enterprise customers, their jurisdiction of incorporation, federal tax ID, and nature of business. Momentum may also utilize third-party agencies to gauge credit and/or fraud risk associated with a potential customer. Momentum's policy is to request additional information from the customer if Momentum cannot validate the customer based on the initial information provided. Momentum will not provide service if a new customer's identification cannot be verified. Through its retail terms of service, Momentum requires its enterprise customers to comply with all applicable laws in relation to its voice services, explicitly prohibiting any abusive or unlawful use of the service.

Know-Your-Upstream Providers. El Reno relies on Momentum's Know-Your-Upstream Provider processes. Momentum states that it knows all 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 confirms that all upstream providers from which it receives traffic are listed in the FCC's Robocall Mitigation Database.

Traceback. El Reno will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.

El Reno reserves the right to modify and/or supplement this Robocall Mitigation Plan to adapt to risks and to improve the overall effectiveness of our program.