

Bradley Fiber, LLC Robocall Mitigation Database Certification

Certification Statement

Pursuant to **47 CFR § 64.6305(a)**, **Bradley Fiber** hereby certifies that it has implemented and maintains an **appropriate robocall mitigation program** designed to prevent the origination of illegal robocall traffic on its network.

Bradley Fiber provides voice service as an **Internet Service Provider reselling interconnected VoIP service. Outbound voice calls are originated through an upstream voice service provider, Momentum Telecom, Inc. (“Momentum”)**. Bradley Fiber does not directly originate calls to the public switched telephone network (PSTN).

Robocall Mitigation Program Description

Bradley Fiber’s robocall mitigation program includes reasonable measures appropriate to its role as a VoIP reseller and its reliance on Momentum as its upstream originating carrier:

1. Customer Vetting and Acceptable Use

Bradley Fiber performs reasonable due diligence on its residential and business voice customers, including identity verification at service initiation. Bradley Fiber’s acceptable use policies expressly prohibit the use of its voice services for illegal robocalls, spoofing, or other unlawful calling practices.

2. Upstream Carrier Monitoring and Controls

Bradley Fiber relies on **Momentum Telecom, Inc.** to perform network-level robocall mitigation, including call traffic monitoring, analytics, and blocking designed to identify and prevent illegal robocall traffic prior to PSTN origination, consistent with FCC rules and industry best practices.

3. Coordination and Remediation

Bradley Fiber maintains ongoing coordination with Momentum regarding robocall mitigation and customer activity. Upon receiving notice of suspected illegal robocall traffic, Bradley Fiber promptly investigates and takes appropriate corrective action, which may include customer notification, service suspension, or termination, in coordination with Momentum.

4. Traceback Cooperation

Bradley Fiber commits to **respond fully and within 24 hours** to traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Group (ITG). Bradley Fiber will cooperate with Momentum as necessary to support traceback investigations and identify the source of suspect traffic.

5. Ongoing Compliance Review

Bradley Fiber periodically reviews its robocall mitigation practices and its upstream carrier relationship with Momentum to ensure continued compliance with **47 CFR § 64.6305** and related FCC guidance.

STIR/SHAKEN Status

Bradley Fiber certifies that it **is not required to implement STIR/SHAKEN** because it does not directly originate calls to the PSTN and relies on **Momentum Telecom, Inc.** as its upstream originating voice service provider. Bradley Fiber therefore complies with the FCC's rules through its robocall mitigation program as required by **47 CFR § 64.6305(a)**.