

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Robocall Mitigation Plan

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WC Docket No. 17-97

CERTIFICATION PURSUANT TO 47 C.F.R. 64.6305(d)

1. I, Dave Nowotarski, Chief Financial Officer of Niacom Holdings, LLC ("NIACOM"), submits this certification to the extent NIACOM operates as a voice service provider.
2. NIACOM is a VoIP Reseller, not a facilities-based voice service provider, and does not directly interconnect with the Public Switched Telephone Network (PSTN). NIACOM does not have the infrastructure necessary for the implementation of the STIR/SHAKEN authentication framework, as described in its Robocall Mitigation Database (RMD) registration. All calls are originated on and routed through NIACOM's Upstream Providers who have fully implemented STIR/SHAKEN as described in their respective Robocall Mitigation Database ("RMD") registrations. All calls are subject to the attached Robocall Mitigation Plan described in Appendix A. No prior NIACOM certification has been removed by FCC action and NIACOM has not been prohibited from filing in the RMD.

3. At no time in the prior two years has NIACOM been the subject of a formal Federal Communications Commission (FCC), law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient RMD certification or mitigation program description.
4. The statements and information contained in this certification are accurate and complete to the best of my knowledge and belief.
5. Pursuant to 47 C.F.R. § 1.16, I certify under penalty of perjury that the foregoing is true and correct.

Name: Dave Nowotarski

Title: Chief Financial Officer

Signed by:
Signature: Dave Nowotarski
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Date Signed: 1/5/2026 | 5:05:33 AM PST

APPENDIX A

NIACOM HOLDINGS, LLC STATEMENT IN SUPPORT OF ITS VOICE SERVICE PROVIDER CERTIFICATION AND DESCRIPTION OF ITS ROBOCALL MITIGATION PROGRAM

Niacom Holdings, LLC ("NIACOM"), a domestic voice service provider directly serving end users certifies that it has not implemented STIR/SHAKEN on any portion of its network because NIACOM does not own or control the network infrastructure necessary to implement STIR/SHAKEN. See Report and Order, WC Docket 17-97, released March 31, 2020, at paragraph 40.

For purposes of the Robocall Mitigation Database filing information elements, NIACOM will identify itself as a voice service provider without a STIR/SHAKEN implementation obligation in accordance with 47 C.F.R. § 64.6305(d)(4)(vi)(C). Calls using NIACOM's service originate on its Upstream Providers' networks, and those Upstream Providers will sign those calls. NIACOM's Upstream Providers are voice service providers that have implemented STIR/SHAKEN, as reflected in their respective Robocall Mitigation Database registrations.

This Robocall Mitigation Plan describes the specific measures that NIACOM has implemented as of the date of its Robocall Mitigation Database filing. NIACOM continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed. This Robocall Mitigation Plan will evolve to respond to the constantly changing practices and techniques that are used to detect and prevent illegal robocalling. NIACOM will continue to monitor industry best practices and improve its internal processes to ensure that this Robocall Mitigation Plan is current. In the event of any material change to this Robocall Mitigation Plan, NIACOM will submit such update to the FCC's Robocall Mitigation Database.

Business name and address: NIACOM Holdings, LLC, c/o FastBridge Fiber, LLC, Attn. Regulatory Affairs, 1050 Spring Street Suite 2, Wyomissing, PA 19610

OCN: NIACOM does not have an Operating Company Number (OCN).

Contacts: Primary Contact: Dave Nowotarski, Chief Financial Officer, NIACOM Holdings, LLC, c/o FastBridge Fiber, LLC, 1050 Spring Street Suite 2, Wyomissing, PA 19610, dave.nowotarski@fastbridgefiber.com, (610) 451-7011. Secondary Contact: Randy Whitehead, Vice President of Regulatory Affairs, Niacom Holdings, LLC, c/o FastBridge Fiber, LLC, Attn. Regulatory Affairs, 1050 Spring Street Suite 2, Wyomissing, PA 19610, randy.whitehead@fastbridgefiber.com, (610) 871-7048.

Specific reasonable steps Niacom has taken to avoid originating and facilitating illegal robocall traffic as part of its robocall mitigation program:

NIACOM has implemented "Know Your Customer" processes to mitigate the risk that it may inadvertently enable illegal robocalls on behalf of its customers. NIACOM follows procedures for ensuring it knows the identities of its customers. NIACOM uses a customer onboarding process designed to proactively identify and prevent those that may engage in illegal robocalling from becoming NIACOM customers. Customers must provide their names, addresses, verified e-mail address(es), verified phone number(s), validated payment information, and, if the customer is a legal entity, the state or country of formation, contact person, and company registration number. NIACOM verifies the information obtained from the customer through the collection and validation of the following documentation, as appropriate for the customer and the services requested:

1. Proof of Identity: A digital copy of a current, valid government-issued form of identification for the applicant, such as a passport or driver's license.

2. Proof of Business Legal Entity: If a business, official documentation verifying existence of the legal entity and registered address (e.g., business license, articles of incorporation/organization, EIN documentation, or other documentation appropriate to the customer's country of operations).

3. Proof of Authorized Individual: If a business, documentation verifying that the individual purporting to act on behalf of the business has authority to do so (e.g., letter of authority, board minutes, officer certification, or other suitable documentation).

To the extent that NIACOM receives information from law enforcement, the Federal Communications Commission, the industry traceback consortium, its Upstream Providers, or other credible sources that a NIACOM customer is engaged in illegal calling, NIACOM's policy is to cooperate fully within the scope of information in NIACOM's possession, custody, or control, including by providing the identity of any suspected illegal robocaller pursuant to legal service of process and by coordinating promptly with its Upstream Providers. NIACOM does not own or control the network infrastructure to independently monitor, detect, or analyze call traffic patterns on the Upstream Provider's networks.

Accordingly, NIACOM's mitigation program focuses on customer identity verification, contractual controls, and escalation workflows. Where NIACOM receives complaints or other credible indicators of potentially illegal robocalling or spoofing, NIACOM will promptly investigate using available account-level information, engage the customer as appropriate, and escalate the matter to its Upstream Providers for network-level review, blocking, traceback support, or other remedial action.

NIACOM relies on its Upstream Providers' STIR/SHAKEN implementation and associated analytics, mitigation, and blocking capabilities, and maintains procedures to ensure that its Upstream Providers remain properly listed in the Robocall Mitigation Database and have fully implemented STIR/SHAKEN.

Upstream Providers: NIACOM's arrangements with its Upstream Providers require compliance with applicable laws and FCC rules.

Commitment to Respond to Traceback Requests: NIACOM commits to respond fully and within twenty-four (24) hours to traceback requests from law enforcement, the Federal Communications Commission, and the Industry Traceback Consortium to the extent information is within NIACOM's possession, custody, or control, including providing relevant customer identification and account information and promptly coordinating with NIACOM's Upstream Providers for any network-level traceback and mitigation actions.

Robocall Mitigation Database Filings: NIACOM checks the Robocall Mitigation Database and only utilizes Upstream Voice Service Providers whose filings appear in the Robocall Mitigation Database and have not been delisted pursuant to an enforcement action.

Affiliated entities covered by Niacom's Robocall Mitigation Plan: NONE