



Masergy Cloud Communications, Inc.
Robocall Mitigation Plan

Introduction

This document details the “reasonable steps” that Masergy Cloud Communications, Inc. (“Masergy”)¹ has taken to avoid the origination of illegal robocall traffic as part of its robocall mitigation program.

Masergy is a wholly owned subsidiary of Comcast Corporation that offers retail voice services to business customers under the Comcast Business Global brand. Among other things, this document describes the analyses that are performed and actions taken by Masergy to identify sources of voice traffic that are likely to be associated with illegal robocalls; to pre-qualify prospective customers; to monitor existing customers for traffic patterns and other information indicative of the potential for transmitting illegal robocalls; and to mitigate the acceptance and transport of illegal robocall traffic on the Masergy network.

Masergy is committed to responding fully and within 24 hours to all traceback requests from the Commission, law enforcement agencies, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping illegal robocallers that use Masergy’s service to originate calls.

A. Know Your Customer

Masergy employs a variety of “know your customer” initiatives, tailored according to service type.

Among other efforts, sales agents are provided with material to assist them in evaluating a prospective customer’s business model and the potential for the prospective customer to use the service to engage in illegal robocalling, rather than only for legal purposes. In particular, prospective customers are required to provide details regarding the types and volume of traffic that they anticipate originating and transporting as well as the customers that they serve.

Masergy’s customers are required to sign a Master Service Agreement (“MSA”) that prohibits them from using the service to engage in illegal robocalling. Masergy’s Acceptable Use Policy further prohibits customers and their users from utilizing the service for any unlawful purposes or to engage in any other improper activities, including calling patterns that are atypical of commercial usage. The MSA authorizes Masergy to suspend and/or terminate service for violations of these and other terms and conditions.

B. Know Your Upstream Provider

Masergy is transitioning to using its corporate affiliate, Comcast IP Phone, LLC, as its only upstream provider. Comcast IP Phone, LLC’s extensive robocall mitigation efforts are detailed in the company’s own Robocall Mitigation Plan. Until this transition is complete, certain Masergy traffic may be handled by a single third-party upstream provider whose acceptable use policy generally prohibits illegal calling practices (e.g., forging message headers). In addition, this third-party upstream provider utilizes various fraud prevention tools and undertakes efforts

¹ This Robocall Mitigation Plan and the accompanying certification in the FCC’s Robocall Mitigation Database is limited to retail voice services provided to Masergy customers.

to identify and address illegal robocallers that use or transmit traffic to its network. This third-party's robocall mitigation efforts are detailed in its own Robocall Mitigation Plan.

C. Analytics-Based Tools and Other Robocall Mitigation Techniques

Masergy relies on various analytics-based tools and other techniques to identify and mitigate illegal robocalls, including:

Network-Level Blocking. Masergy's tools automatically screen, alarm, report, and reject at the network edge calls with indicia of fraudulent robocalling or that originate from numbers on Do-Not-Originate ("DNO") lists or from invalid or unallocated numbers.

Additional Tools. Masergy offers various additional tools to enable its customers to efficiently and effectively manage their receipt and origination of calls, including:

- Anonymous Call Rejection, which enables a customer to automatically reject calls where the caller has chosen to prevent the display of the caller's name and number;
- Selective Call Rejection (also known as Call Screening), which enables a customer to create a list of telephone numbers that will not ring through to the customer's phone; and
- Call Barring, which allows customers to automatically stop the transmission of certain outbound call types to limit potentially harmful calling practices by individual users.

Call Authentication Technology. Masergy has fully implemented the STIR/SHAKEN call authentication framework, including standards-compliant signing, tagging, and verification functions, across its entire network. In addition, Masergy relies on analytics to enrich calling name information as appropriate, including by displaying applicable tags (e.g., "SPAM") to call recipients in their caller ID display.

Traffic Monitoring. Masergy customers' traffic is monitored on an ongoing basis for indicia of illegal robocalling, based on, among other factors, STIR/SHAKEN statistics and SIP authentication errors, as well as average call length, call originate rates, call answer rates, and calling patterns that are atypical of standard commercial usage. Masergy conducts customer outreach if data suggests improper activity is occurring, and takes appropriate action based on such monitoring and outreach. Where Masergy identifies instances of illegal robocalling or other forms of abusive calling, the company takes steps to address such activities, including initiating mitigation measures and, where appropriate, suspending, terminating, or permanently disconnecting service.

Principals, Affiliates, Subsidiaries, and Parent Companies

Masergy Cloud Communications, Inc. is a wholly owned subsidiary of Comcast Corporation, a publicly traded corporation whose Chairman is Brian Roberts and whose Co-Chief Executive Officers are Mr. Roberts and Michael Cavanagh.

Affiliates of Masergy Cloud Communications, Inc. that are voice service providers and filers in the Robocall Mitigation Database are as follows:

Comcast IP Phone, LLC
Comcast Phone of California, LLC
Comcast Phone of Texas, LLC
Comcast OTR1, LLC
Midcontinent Communications
Network Innovations, LLC