

## **WOW INTERNET, CABLE, AND PHONE ROBOCALL MITIGATION PLAN**

WOW INTERNET, CABLE, AND PHONE has fully implemented the STIR/SHAKEN authentication framework across its entire IP-based network and all calls it originates in IP are compliant with 47 CFR § 64.6301(a)(1) and (2). WOW INTERNET, CABLE, AND PHONE signs the calls originating on the IP-based network with its own token and makes the attestation decisions for those calls.

Additionally, all voice traffic that originates on WOW INTERNET, CABLE, AND PHONE's network is subject to the following Robocall Mitigation Plan.

### **Robocall Mitigation Plan**

#### **Third-Party Call Analytics**

WOW INTERNET, CABLE, AND PHONE uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and to identify potentially unlawful call origination activity. The vendor's analytics scores the calls based on their behavior. WOW INTERNET, CABLE, AND PHONE receives real-time notifications of telephone numbers suspected of originating illegal robocalls on its network. As described below, WOW INTERNET, CABLE, AND PHONE can then investigate those calls and take steps, as needed, to ensure that its network is not being used to generate illegal robocalls.

WOW INTERNET, CABLE, AND PHONE blocks the following types of calls by default:

- Calls originating from invalid numbers
- Calls originating from DNO numbers
- Calls identified by TNS Call Guardian as likely to be illegal

#### **Internal Traffic Monitoring & Analytics**

WOW INTERNET, CABLE, AND PHONE monitors all originating network traffic for suspicious or abnormal call pattern, volume or activity. Calls that meet the below qualifying factors are investigated internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short timeframe
- Short duration calls
- Low average call duration
- Low call completion ratios
- Sequential dialing patterns
- Neighbor spoofing patterns
- Patterns that indicate contract violations
- Purported illegal robocall numbers on lists from regulators, consumers, and other providers
- Comparison of dialed numbers to the National/State Do Not Call Registry

**WOW INTERNET, CABLE, AND PHONE** blocks the origination of calls from unassigned telephone numbers out of its assigned NPA-NXX inventory and calls originating from numbers that are not valid NANP numbers. Examples of such invalid numbers include those that use an unassigned area code; that use an abbreviated dialing code, such as 91155 or 411, in place of an area code; that do not contain the requisite number of digits; and that are a single digit repeated, such as 000-000-0000, with the exception of 888-888-8888, which is an assignable number.

**WOW INTERNET, CABLE, AND PHONE** also blocks the origination of calls from telephone numbers on its internal Do Not Originate (DNO) list.

### **Investigation**

WOW INTERNET, CABLE, AND PHONE investigates calls identified by TNS as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls. In addition, if WOW INTERNET, CABLE, AND PHONE has any other reason to suspect illegal robocalling or spoofing is taking place over its network, WOW INTERNET, CABLE, AND PHONE will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

### **Enforcement**

All WOW INTERNET, CABLE, AND PHONE customers are subject to terms and conditions of their subscription (service terms). The service terms include provisions regarding acceptable use of the WOW service and include notice that use of the service must be in accordance with applicable law and may not be used to originate illegal traffic, which includes prohibition of things like fraudulent spoofing and illegal robocalls. If WOW INTERNET, CABLE, AND PHONE determines that a customer is using our network to fraudulently spoof calls or to originate illegal robocalls, WOW INTERNET, CABLE, AND PHONE will, as appropriate, either warn the customer to stop such practices or terminate their service as allowed per WOW INTERNET, CABLE, AND PHONE service terms and policies. WOW INTERNET, CABLE, AND PHONE closely monitors any customer that receives a warning to ensure that they cease the behavior that resulted in the warning. If the behavior continues, WOW INTERNET, CABLE, AND PHONE will terminate their service.

### **Know Your Customer**

WOW INTERNET, CABLE, AND PHONE has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. WOW INTERNET, CABLE, AND PHONE thoroughly vets new residential and business customers as follows: residential customers are asked to provide their full name, address (physical and mailing, if different), date of birth, phone number, and email, and establish a PIN or password. Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, and email, and establish a PIN.

### **Know Your Upstream Provider**

WOW INTERNET, CABLE, AND PHONE knows all the providers from which it receives traffic and has confirmed that all of the providers are listed in the Robocall Mitigation Database.

WOW INTERNET, CABLE, AND PHONE has also reviewed the connected providers' publicly available Robocall mitigation plans to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. In addition, WOW INTERNET, CABLE, AND PHONE is now incorporating traceback and prohibited traffic language in all new contractual agreements with upstream providers.

**Traceback**

WOW INTERNET, CABLE, AND PHONE commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. WOW INTERNET, CABLE, AND PHONE commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within 24 hours.

**Customer Education**

WOW INTERNET, CABLE, AND PHONE posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.