

## **MEDIACOM COMMUNICATIONS CORPORATION**

### **STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)**

Pursuant to 47 C.F.R. § 64.6305, Mediacom Communications Corporation and MCC Telephony LLC d/b/a Xtream, (“Mediacom”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls, as of June 30, 2021. Mediacom reserves the right to modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time as it deems appropriate to reflect its business, its capabilities, and its needs.

#### **Company Background**

Mediacom is a local telephony provider in the United States, providing interconnected VoIP telephone service in addition to internet and cable TV services, to residential and business customers. Mediacom serves customers in 1,500 communities in 22 states. Mediacom originates and terminates call traffic; it does not serve as an intermediate provider for call traffic.

As discussed below, Mediacom is implementing STIR/SHAKEN in the IP portions of its networks. Mediacom has implemented a Robocall Mitigation Program for its entire operation and Mediacom has deployed protections designed to ensure that it remains free of illegal robocalls on its network.

#### **STIR/SHAKEN Implementation**

Mediacom will comply with all conditions set forth in the FCC’s orders, rules, and policies regarding the implementation of the STIR/SHAKEN framework for voice service providers, including the First Call Authentication Report and Order and Second Call Authentication Report and Order.<sup>1</sup> With respect to the non-IP portions of its network, Mediacom is subject to a continuing extension of the requirements of § 64.6301 for this portion of its network and will comply with the requirements of § 64.6303 as to the portion of its network subject to the extension.

Working with third-party vendor Metaswitch, Mediacom has implemented a STIR/SHAKEN system that consists of a multi-server application built in a virtual machine environment within Mediacom’s data centers. This application integrates with Mediacom’s session border controllers to provide the required STIR/SHAKEN functionalities. Mediacom expects to complete all lab testing for the implementation of STIR/SHAKEN in the IP portions of its network by June 30, 2021, and over the following two months, it will roll out production of the technical procedures to authenticate and sign calls that it originates using Session Initiation Protocol (SIP). Mediacom anticipates having STIR/SHAKEN fully implemented in the IP portions of its network by early September 2021.

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<sup>1</sup> *Call Authentication Trust Anchor; Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97 and 20-67, Report and Order and Further Notice of Proposed Rulemaking, FCC 20-42 (rel. Mar. 31, 2020); *Call Authentication Trust Anchor*, WC Docket Nos. 17-97, Second Report and Order, FCC 20-136 (rel. Oct. 1, 2020).

correlation to its internal maps to verify accuracy and serviceability. Mediacom conducts a credit check for all customers and confirms customers do not have bad debt with Mediacom.

- Mediacom collects information for customers who are porting numbers. For both residential and business customers, Mediacom collects the number, customer names, and account number associated with the prior carrier and also confirms the number is still active with the current carrier. For business customers, Mediacom also verifies whether the customer has any primary interexchange carrier freezes and completes a third-party verification or has the customer sign a letter of authority.
- Residential customers are prohibited from transferring or assigning their services with Mediacom. Business customers must complete a change in ownership form when an account will be controlled and the services used by a different entity.
- Mediacom documents information collected and diligence completed regarding each customer in its enterprise resource planning systems.

#### ***Measures to Prevent or Avoid Exchanging Illegal Robocalls***

- **Contractual Provisions** – Mediacom’s service agreement prohibits receiving, using, or assisting others in receiving or using, any service or service feature without authorization. Mediacom customers may not resell, distribute or duplicate the service, or use the service in any way that may violate law, the signed agreement, third party property, or other rights or Mediacom policies. If Mediacom customers do any of the foregoing or any user of their services violates their agreement in any other way, Mediacom may restrict, suspend, or terminate their access to one or more services, report the matter to law enforcement, and pursue any other lawful right or remedy.
- **Traffic Monitoring** -- Mediacom monitors all of its services for violations of its Acceptable Use Policy, including excessive use. Mediacom will terminate or suspend service to customers with a history of non-compliance with its contractual obligations, including provisions relating to acceptable use of the service.
- **Anti-Fraud** – Mediacom monitors calls to detect, notice, and address suspicious calling patterns. Mediacom monitors traffic on its network through third-party technology that analyzes call analytics and metrics including call reputation-based inbound call blocking. Mediacom also uses a third party to monitor lines to detect fraudulent call patterns and high fraud destinations. Mediacom uses its fraud monitoring tool and manual oversight by a support team that follows up with customers who exhibit potential fraud patterns. Mediacom reserves the right to take actions to protect the security and integrity of its network and resources that are consistent with applicable law.
- **Spoofing** – Mediacom does not assist or allow customers to spoof phone numbers. Customers must originate a valid number owned and assigned to them that is reflected in Caller ID, which is controlled by Mediacom on the switching side. Customers that operate their own private branch exchange may attempt to modify their numbers by

- Mediacom is implementing procedures so that it can periodically review records of traceback requests (once such requests are received) to identify customers that are the subject of a pattern of traceback inquiries. Mediacom will determine an appropriate action to take on a case-specific basis, which may include directing the customer to remedy the problem and, if effective action is not taken, temporary suspension of the customer and/or termination of the customer's service.
- Mediacom maintains records of any traceback request it receives and the carrier customer involved in the request.

### ***Cooperation with State and Federal Regulators***

Mediacom will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, Mediacom will:

- Respond to request for information about illegal robocalls;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

**MEDIACOM COMMUNICATIONS CORP.**

**Tapan Dandnaik**

**SVP, Customer Service & Financial Operations**



06/30/2020