

Frontier Communications Robocall Mitigation Program

Robocall Mitigation Plan:

As a Voice Service provider, Frontier authenticates and verifies caller identification information for all SIP calls that transit our own network. Additionally, Frontier authenticates caller identification information for all SIP calls it originates and exchanges via SIP interconnection with another voice service provider or intermediate provider and transmits these calls with authenticated caller identification information to the next voice service provider or intermediate provider in the call path. Frontier verifies caller identification information for all SIP calls it receives from another voice service provider or intermediate provider which it will terminate and for which the caller identification information has been authenticated.

Under 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), and (f)(2)(ii), new and existing filers are required to describe (1) the specific reasonable steps the provider has taken to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program, including (2) how it complies with its obligation to know its customers and/or upstream providers, as applicable, (3) the analytics system(s) it uses to identify and block illegal traffic, and (4) whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s). You failed to provide all required information under the rules by failing to describe how the filer complies with its obligation to know its customers and/or upstream providers, as applicable.

(1) the specific reasonable steps Frontier has taken to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program:

Frontier utilizes both Calling Party Number (CPN) verification and CPN screening to avoid the origination and processing of illegal robocall traffic as part of its robocall mitigation program.

(2) how Frontier complies with its obligation to know its customers and/or upstream providers:

Know your customer: Frontier follows documented processes for customer provisioning within our systems that require the outbound Calling Party Number (CPN) be a verified Frontier customer 10-digit telephone number. This policy demonstrates that Frontier knows-our-customers and enforces that the originating outbound CPN belongs to our customer and eliminates the origination of caller ID Spoofing.

(3) the analytic systems Frontier uses to identify and block illegal traffic:

- Frontier uses Neustar's Certified Caller service. This cloud-based solution offers automated caller identity validation by implementing the latest STIR/SHAKEN call authentication standards, allowing Frontier to detect and flag illegally spoofed calls in real time to protect users from phone scams and support trusted communications.
- Frontier also uses Neustar's Robocall Mitigation service. This solution uses advanced call analytics, fraud modeling and numbering expertise to enable Frontier to identify illegal calls originating in the network and stop them from reaching subscribers. Robocall Mitigation works alongside STIR/SHAKEN call authentication to help Frontier identify unauthorized and suspicious use of phone numbers and detect trends and anomalies in calling patterns.

(4) third-party analytics vendor(s) and the name(s) of such vendor(s):

Frontier uses Neustar as our 3rd party analytics vendor.

- Frontier commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium and to cooperate with such entities in investigating and stopping illegal robocallers that use its service.
- Know your customer: Frontier customer provisioning requires that the outbound caller ID can only be a verified customer 10-digit telephone number. This policy demonstrates that Frontier knows-our-customers and enforces that the outbound caller ID belongs to our customer and eliminates the origination of caller ID Spoofing.
- Know-your-upstream-providers: Frontier interconnection contracts include provisions with upstream providers designed to mitigate illegal robocalls terminate calls that do not contain an acceptable STIR/SHAKEN signature.
- Frontier uses Neustar's Certified Caller service. This cloud-based solution offers automated caller identity validation by implementing the latest STIR/SHAKEN call authentication standards, allowing Frontier to detect and flag illegally spoofed calls in real time to protect users from phone scams and support trusted communications.
- Frontier also uses Neustar's Robocall Mitigation service. This solution uses advanced call analytics, fraud modeling and numbering expertise to enable Frontier to identify illegal calls originating in the network and stop them from reaching subscribers. Robocall Mitigation works alongside STIR/SHAKEN call authentication to help Frontier identify unauthorized and suspicious use of phone numbers and detect trends and anomalies in calling patterns.

Principals, Affiliates, Subsidiaries, and Parent Companies:

List of subsidiaries of Frontier Communications Parent, Inc.*

As of December 1, 2021

Entity Name Domestic Jurisdiction

Citizens Capital Ventures Corp. Delaware

Citizens Directory Services Company L.L.C. Delaware

Citizens Louisiana Accounting Company Delaware

Citizens Newcom Company Delaware

Citizens Newtel, LLC Delaware

Citizens Pennsylvania Company LLC Delaware

Citizens SERP Administration Company Delaware

Citizens Telecom Services Company L.L.C. Delaware

Citizens Telecommunications Company of California Inc. California

Citizens Telecommunications Company of Illinois Illinois

Citizens Telecommunications Company of Minnesota, LLC Delaware

Citizens Telecommunications Company of Nebraska Delaware

Citizens Telecommunications Company of Nebraska LLC Delaware

Citizens Telecommunications Company of Nevada Nevada

Citizens Telecommunications Company of New York, Inc. New York

Citizens Telecommunications Company of Tennessee L.L.C. Delaware

Citizens Telecommunications Company of The White Mountains, Inc. Delaware

Citizens Telecommunications Company of Utah Delaware

Citizens Telecommunications Company of West Virginia West Virginia

Citizens Utilities Capital L.P. Delaware

Citizens Utilities Rural Company, Inc. Delaware

Commonwealth Communication, LLC Delaware

Commonwealth Telephone Company LLC Pennsylvania

Commonwealth Telephone Enterprises LLC Delaware

Commonwealth Telephone Management Services, Inc. Pennsylvania

CTE Holdings, Inc. Pennsylvania

CTE Services, Inc. Pennsylvania

CTE Telecom, LLC Pennsylvania

CTSI, LLC Pennsylvania

CU Capital LLC Delaware

CU Wireless Company LLC Delaware

Electric Lightwave NY, LLC Delaware

Evans Telephone Holdings, Inc. Delaware

Fairmount Cellular LLC Georgia

Frontier ABC LLC Delaware

Frontier California Inc. California

Frontier Communications - Midland, Inc. Illinois

Frontier Communications - Prairie, Inc. Illinois
Frontier Communications - Schuyler, Inc. Illinois
Frontier Communications Corporate Services Inc. Delaware
Frontier Communications Holdings, LLC Delaware
Frontier Communications ILEC Holdings LLC Delaware
Frontier Communications Intermediate, LLC Delaware
Frontier Communications of America, Inc. Delaware
Frontier Communications of Ausable Valley, Inc. New York
Frontier Communications of Breezewood, LLC Pennsylvania
Frontier Communications of Canton, LLC Pennsylvania
Frontier Communications of Delaware, Inc. Delaware
Frontier Communications of Depue, Inc. Illinois
Frontier Communications of Georgia LLC Georgia
Frontier Communications of Illinois, Inc. Illinois
Frontier Communications of Indiana, LLC Indiana
Frontier Communications of Iowa, LLC Iowa
Frontier Communications of Lakeside, Inc. Illinois
Frontier Communications of Lakewood, LLC Pennsylvania
Frontier Communications of Michigan, Inc. Michigan
Frontier Communications of Minnesota, Inc. Minnesota
Frontier Communications of Mississippi LLC Mississippi
Frontier Communications of Mt. Pulaski, Inc. Illinois
Frontier Communications of New York, Inc. New York
Frontier Communications of Orion, Inc. Illinois
Frontier Communications of Oswayo River LLC Pennsylvania
Frontier Communications of Pennsylvania, LLC Pennsylvania
Frontier Communications of Rochester, Inc. Delaware
Frontier Communications of Seneca-Gorham, Inc. New York
Frontier Communications of Sylvan Lake, Inc. New York
Frontier Communications of the Carolinas LLC Delaware
Frontier Communications of The South, LLC Alabama
Frontier Communications of The Southwest Inc. Delaware
Frontier Communications of Thorntown, LLC Indiana
Frontier Communications of Virginia, Inc. Virginia
Frontier Communications of Wisconsin LLC Wisconsin
Frontier Communications Online And Long Distance Inc. Delaware
Frontier Communications Services Inc. Arizona
Frontier Directory Services Company, LLC Delaware
Frontier Florida LLC Florida
Frontier Infoservices Inc. Delaware
Frontier Midstates Inc. Georgia
Frontier Mobile LLC Delaware
Frontier North Inc. Wisconsin

Frontier Security Company Delaware
Frontier Services Corp. Connecticut
Frontier Southwest Incorporated Delaware
Frontier Subsidiary Telco LLC Delaware
Frontier Techserv, Inc. Delaware
Frontier Telephone Of Rochester, Inc. New York
Frontier Video Services Inc. Delaware
Frontier West Virginia Inc. West Virginia
GVN Services California
Navajo Communications Co., Inc. New Mexico
N C C Systems, Inc. Texas
Newco West Holdings LLC Delaware
Ogden Telephone Company New York
Phone Trends, Inc. New York
Rhinelanders Telecommunications, LLC Wisconsin
Rib Lake Cellular For Wisconsin RSA #3, Inc. Wisconsin
Rib Lake Telecom, Inc. Wisconsin
SNET America Inc. Connecticut
TCI Technology & Equipment LLC Delaware
The Southern New England Telephone Company Connecticut
Total Communications, Inc. Connecticut

* All entities other than Frontier Communications Intermediate, LLC are direct or indirect wholly-owned subsidiaries of Frontier Communications Holdings, LLC.

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

In the Matter of	)	
	)	
Exemption from Caller ID Authentication	)	CG Docket No. 17-97
Requirements	)	

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

1. I, Kevin Saville, Vice President and General Counsel for Frontier Communications Parent, Inc., submit this certification on behalf of each Frontier affiliate to the extent it operates as a “voice service provider, gateway service provider, and/or non-gateway intermediate provider.” (“Frontier”)
2. Frontier has implemented the STIR/SHAKEN authentication framework as indicated in its Robocall Mitigation Database registration.
3. The statements and information contained in this certification are accurate and complete to the best of my knowledge and belief.
4. Pursuant to 47 C.F.R. § 1.16, I certify under penalty of perjury that the foregoing is true and correct.

X 
Kevin Saville
Vice President and General Counsel
Frontier Communications Parent, Inc.

August 7, 2026
DATE