



**Robocall Mitigation Plan for Hargray d/b/a Sparklight**

(last updated February 24, 2026)

The Federal Communications Commission (“FCC”) has directed certain providers to upload a Robocall Mitigation Plan to the Robocall Mitigation Database portal that describes the specific reasonable steps the provider has taken to avoid, as applicable, the origination, carrying, or processing of illegal robocall traffic as part of its robocall mitigation plan. Specifically, the FCC requires the following to be included in robocall mitigation plans: (1) voice service providers must describe how they are meeting their existing obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls; (2) non-gateway intermediate providers and voice service providers must, like gateway providers, describe any “know-your-upstream provider” procedures in place designed to mitigate illegal robocalls; and (3) all providers must describe any call analytics systems they use to identify and block illegal traffic including whether they use a third-party vendor or vendors and the name of the vendor(s). This Robocall Mitigation Plan is being filed in accordance with the above-referenced requirements.

**Entities Covered by this Filing**

Hargray Telephone Company, LLC d/b/a Sparklight – FRN: 0001886704 (OCN 240523)

Bluffton Telephone Company, LLC d/b/a Sparklight – FRN: 0005058151 (OCN 240512)

Hargray, LLC d/b/a Sparklight – FRN: 0004940540

Hargray of Alabama, LLC d/b/a Sparklight – FRN: 0028332666

ComSouth Telecommunications, LLC d/b/a Sparklight – FRN: 0004319257 (OCN 220369)

ComSouth Telenet, LLC d/b/a Sparklight – FRN: 0010112571

Referred to as “Hargray” herein.

**Extension under FCC Rule 64.6304(d)**

Hargray offers voice, cable/video, and broadband Internet access services in the states of Alabama, Georgia and South Carolina.

Hargray is a small/rural voice service provider eligible for the STIR/SHAKEN extension under 47 C.F.R. § 64.6304(d) for the non-IP portion of its network. Hargray has implemented STIR/SHAKEN in the IP portion of its network through a third-party, Sinch. Originating calls on the IP-portion of Hargray’s network are signed with its certificate.

The non-IP portion of Hargray’s network relies on technology that cannot initiate, maintain, and terminate SIP calls. Hargray understands it is required to comply with the requirements of 47 C.F.R. § 64.6303 as to the portion of its network subject to the extension and in accordance with that requirement, Hargray participates as a member of a working group, industry standards group, or consortium that is working to develop a non-IP caller identification authentication solution. Hargray understands this extension ends once a caller ID authentication protocol has

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been developed for calls delivered over non-IP networks and is reasonably available.

### **Robocall Mitigation Plan**

Hargray has implemented specific measures to detect and prevent illegal robocalls on its network as of June 28, 2021. Hargray will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described.

Hargray is a voice service provider offering voice services to business and residential customers. Its customers generally do not originate high volume calls and Hargray has not received information suggesting that robocalls are originated by its customers. Therefore, Hargray does not consider its network or its customers at high risk of originating illegal robocalls.

Customer Due Diligence: Hargray has procedures in place to prevent new and renewing customers from using the Hargray network to originate illegal robocalls. Hargray thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Measures to Prevent or Avoid the Origination of Illegal Robocalls: Hargray takes the following measures to prevent or avoid the origination of illegal robocalls:

- Hargray customers are subject to enforceable terms of use and an acceptable use policy for use of all Hargray-provided services. These policies prohibit use of Hargray services for any purpose other than the intended purpose, including use of the services for criminal activity or use in a manner inconsistent with applicable laws, rules, and regulations.
- Hargray has implemented monitoring and reporting procedures designed to detect and prevent fraudulent traffic on its network. Hargray also uses the Ribbon Identity HUB data analytics product offered by Ribbon Communications to identify potential illegal robocall traffic.
- Hargray has completed the “know-your-customer” screening process for the carriers to which it interconnects. Hargray is subject to provisions in its interconnection and commercial agreements that require Hargray to take steps to prevent illegal robocalls on its network.
- Hargray has fully implemented STIR/SHAKEN in the IP portion of its network.
- If Hargray has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

### **Responding to Traceback Requests and Cooperation with State and Federal Regulators**

Hargray commits to respond to traceback requests and to cooperate with investigating and stopping illegal robocalls as necessary. Hargray will respond to traceback requests received from the Industry Traceback Group, the FCC, or law enforcement within 24 hours as required under FCC rules. Hargray has designated the following as contacts for the Industry Traceback Group:

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### Primary Contact:

Scott Adams  
Voice Operations Manager  
Cable One, Inc.  
210 E. Earll Drive  
Phoenix, AZ 85012  
Office Number: 573-468-1221  
Email: Scott.Adams@cableone.biz.  
Business Hours: M-F 8am-5pm Central Time

### Secondary Contact:

Chris Davis  
Manager of Voice Engineering  
Cable One, Inc.  
210 E. Earll Drive  
Phoenix, AZ 85012  
Office Number: 843-686-1334  
Email: Chris.Davis@sparklight.biz  
Business Hours: M-F 8am – 5pm Eastern Time

Hargray also will cooperate with state and federal regulators to prevent, detect, and mitigate illegal robocalls as applicable. Specifically, Hargray will:

- Respond to valid law enforcement requests;
- 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.

### **Principals, Affiliates, Subsidiaries, and Parent Companies**

Hargray Telephone Company, LLC is a wholly owned subsidiary of Cable One, Inc. d/b/a Sparklight (“Sparklight”), a publicly traded Delaware corporation.

The following are the FCC-regulated affiliates of Hargray:

- Cable One VoIP LLC d/b/a Sparklight
- Fidelity Telephone LLC d/b/a Sparklight
- Fidelity Cablevision, LLC d/b/a Sparklight
- CoBridge Communications LLC d/b/a Sparklight
- CoBridge Broadband, LLC d/b/a Sparklight
- Bluffton Telephone Company, LLC d/b/a Sparklight
- ComSouth Telecommunications, LC d/b/a Sparklight
- ComSouth Telenet, LLC d/b/a Sparklight
- Hargray, LLC d/b/a Sparklight
- Hargray of Alabama, LLC d/b/a Sparklight

## Robocall Mitigation Plan for Hargray d/b/a Sparklight

Sparklight holds an approximately 57% interest in Clearwave Fiber LLC (“Clearwave”), a Delaware limited liability company that acts as a holding company. Clearwave holds 100% of the interests of Delta Communications, L.L.C. d/b/a Clearwave Communications (“Delta”), an Illinois limited liability company. Delta holds 100% of the interests of Hargray of Georgia, LLC, a South Carolina limited liability company, and Hargray of Florida LLC, a Georgia limited liability company.

Sparklight holds an approximately 45% of the interests in Mega Broadband Investments Holdings LLC, and 45% of the membership interests in Mega Broadband Blocker, LLC (Class B Units) d/b/a Vyve Broadband (MBI).

Sparklight holds an approximately 22% interest in AMG Technology Holdings, LLC d/b/a Nextlink Broadband and Nextlink Internet, a Texas limited liability company.

Sparklight holds a less than 10% equity interest in Point Broadband Holdings, LLC, a Delaware limited liability company.

Sparklight holds a less than 10% equity interest in Visionary Broadband Holdings, LLC, a Delaware limited liability company.

As of July 1, 2025, the corporate officers of each of the Hargray entities listed above are:

- Kenneth E. Johnson, President
- Todd M. Koetje, Vice President
- Jarrod L. Head, Vice President
- Quynh A. Tran, Vice President & Treasurer
- Krista M. Kauffman, Vice President
- Jane E. Shanley, Vice President
- Christopher J. Arntzen, Secretary