

Robocall Mitigation Plan for Clearwave Fiber

(last updated January 2, 2026)

As reflected in 47 CFR § 64.6305, the Federal Communications Commission (“FCC”) has directed certain voice 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).

Clearwave Fiber submits this Robocall Mitigation Plan to describe the process and procedures that Clearwave Fiber uses to alleviate the origination of illegal robocalls on its network. Clearwave Fiber has implemented procedures and policies to detect and prevent unlawful robocalls from originating on its network, and Clearwave Fiber has completed implementation of the STIR/SHAKEN authentication framework.

All calls that originate on the Clearwave Fiber network are subject to the described robocall mitigation program. Clearwave Fiber may periodically modify, add, delete, or otherwise alter any of the policies and procedures described in the plan at any time to respond to changes in its business, its capabilities, and its needs.

Entities Covered by Robocall Mitigation Plan

Delta Communications, L.L.C. d/b/a Clearwave Fiber
Hargray of Georgia, LLC d/b/a Clearwave Fiber
Hargray of Florida, LLC d/b/a Clearwave Fiber

These entities are collectively referred to as “Clearwave Fiber” herein. Clearwave Fiber is a “voice service provider” as defined by the FCC.¹ Clearwave Fiber is not a “gateway provider” or an “intermediate provider” as defined by the FCC.²

¹ The term “voice service” means any service that is interconnected with the public switched telephone network and that furnishes voice communications to an end user using resources from the North American Numbering Plan, including, without limitation, any service that enables real-time, two-way voice communications, including any service that requires Internet Protocol-compatible customer premises equipment and permits outbound calling, whether or not the service is one-way or two-way voice over Internet Protocol. *See* 47 C.F.R. § 64.6300(o).

² *See* 47 C.F.R. § 64.6300(d) (defining “gateway provider” as “a U.S.-based intermediate provider that receives a call directly from a foreign originating provider or foreign intermediate provider at its U.S.-based facilities before transmitting the call downstream to another U.S.-based provider”); *id.* § 64.6300(g) (defining “intermediate provider” as “any entity that carries or processes traffic that traverses or will traverse the public switched telephone network at any point insofar as that entity neither originates nor terminates that traffic”).

Originating Traffic Monitoring and Third-Party Analytics

Clearwave Fiber has contracted with TNS Call Guardian Authentication Hub to provide robocall analytics of its network's outbound traffic. The TNS Call Guardian analytics identify patterns of suspected illegal robocalls based on behavior and/or their status as suspected robocalls as reported to the FCC and Federal Trade Commission ("FTC"), and as reported by other carriers.

TNS Call Guardian is an industry-leading fully managed end-to-end call authentication solution that fully satisfies the FCC STIR/SHAKEN requirements. With TNS Call Guardian, Clearwave Fiber can monitor originating network traffic for suspicious or abnormal call volume or activity. This provides Clearwave Fiber with real-time scoring to detect problems as they occur, providing caller reputation of incoming calls. Clearwave Fiber has the tools to differentiate legitimate users of communications services from abusive, fraudulent, and unlawful users, and to accurately detect robocalls and caller ID spoofing.

Clearwave Fiber routinely reviews the Call Guardian analytics and take appropriate action based on the reputation scoring and analytics, and in accordance with Clearwave Fiber's Terms and Conditions and Acceptable Use Policy. These policies prohibit use of Clearwave Fiber services for any purpose other than the intended purpose, including use of Clearwave Fiber services for criminal activity or use in a manner inconsistent with applicable laws, rules, and regulations.

Clearwave Fiber understands that its underlying third-party providers may also use analytics in their networks.

Robocall Mitigation Enforcement

Clearwave Fiber will investigate factors around call analytics and then respond with appropriate measures such correction, suspension, or even termination of originating traffic identified as illegal robocalls or as fraudulent use. Clearwave Fiber uses the TNS Call Guardian to enforce robocall mitigation across all voice services platforms.

Risk Assessment

Clearwave Fiber is a voice service provider offering a voice calling services and features on two (2) distinct Voice Over IP based platforms: 1) Metaswitch, A Microsoft Company cloud-based soft switch; and 2) Atlas, an Inteliquent / Sinch unified communications service cloud-based platform. All customers are provisioned for services on either IP voice services platform. Clearwave Fiber customers have locations only in the lower continental United States. Its customers generally do not originate high volume calls, and Clearwave Fiber has not received any information suggesting that robocalls are originated by its customers. Therefore, Clearwave Fiber does not consider its network at high risk of originating illegal robocalls.

Traceback Requests and Cooperation with State/Federal Regulators

Clearwave Fiber will fully comply and assist with all traceback requests from the FCC, law enforcement, and the industry traceback consortium. Clearwave Fiber has designated an individual as a dedicated point of contact for addressing traceback requests as well as a backup person to that individual. Clearwave Fiber will promptly respond to inquiries received from the Industry Traceback Group within 24 hours as required under FCC rules.

Clearwave Fiber also will cooperate with state and federal regulators to prevent, detect, and mitigate illegal robocalls as applicable. Specifically, Clearwave Fiber will: (1) respond to valid law enforcement requests in a timely manner; (2) provide relevant information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and (3) implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

If Clearwave Fiber detects a pattern of questionable activity, it will require its customer to remedy the problem and, if effective action is not taken to stop the pattern of illegal robocalling, the customer may be suspended and/or terminated.

Due Diligence

Clearwave Fiber has procedures in place to prevent new and renewing customers from using its network to originate illegal robocalls. Clearwave Fiber vets new and returning customers by asking identifiable questions for additional security on each account before activating new service or making changes to existing services. Clearwave Fiber verifies the customer's Emergency 911 address locations are authenticated with the right to present the telephone number / Caller ID. Clearwave Fiber has policies that define circumstances by which it will deny, suspend, or terminate services to a customer as reflected in its Terms and Conditions and Acceptable Use Policy.

Clearwave Fiber also has completed "know-your-customer" screening with its third-party vendors and the providers with which it interconnects and/or has commercial agreements. Those agreements require Clearwave Fiber to take steps to prevent illegal robocalls on its network.