

FiberNet of Ohio, LLC Robocall Mitigation Plan

FiberNet of Ohio, LLC submits this Robocall Mitigation Plan (“Plan”) pursuant to 47 C.F.R. § 64.6305. This Plan describes FiberNet of Ohio, LLC’s efforts to mitigate illegal robocalls consistent with the FCC’s rules. FiberNet of Ohio, LLC may modify, add, delete, or otherwise alter any part of this Plan in order to respond to changes in its business, technologies, needs, industry best practices, or any applicable law or regulations. FiberNet of Ohio, LLC will update this Plan within ten (10) business days following the date of any changes to the Plan.

FiberNet of Ohio, LLC Roles in the Call Chain

FiberNet of Ohio, LLC operates as a voice service provider with a STIR/SHAKEN implementation obligation serving end-users when it provides voice over internet protocol (“VoIP”) services to end-user customers. FiberNet of Ohio, LLC also operates as a gateway provider with a STIR/SHAKEN implementation obligation when it serves as an 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. Except as specifically noted in this Plan, FiberNet of Ohio, LLC undertakes the same mitigation steps (as applicable) when it acts as a voice service provider and a gateway provider.

STIR/SHAKEN Implementation Status

FiberNet of Ohio, LLC completed full implementation of the STIR/SHAKEN Caller ID Authentication Framework across its network as of June 30, 2021, for all traffic originated on its IP network platforms. FiberNet of Ohio, LLC has portions of its network that rely on technology that cannot initiate, maintain, carry, process, or terminate SIP calls. These non-IP portions of its network, which are responsible for only a small part of the traffic originated by FiberNet of Ohio, LLC customers, are deemed subject to a continuing extension pursuant to section 64.6304(d). FiberNet of Ohio, LLC maintains and is ready to provide the Commission on request with documented proof that it is participating as a member of INCOMPAS, which is working to develop a non-internet Protocol caller identification authentication solution, or actively testing such a solution.

Customer Vetting Process

FiberNet of Ohio, LLC vets the identity of subscribers when (i) approving an application for service; (ii) provisioning network connectivity; (iii) entering into a contract agreement; or (iv) granting the right-to-use any U.S. telephone number resources. Before onboarding customers, FiberNet of Ohio, LLC collects information to confirm their identity including their full legal name, federal tax ID (if applicable), principal place of business, contact person, and state or country of incorporation. FiberNet of Ohio, LLC reconfirms this information for renewing customers.

Upstream Provider Vetting Process

FiberNet of Ohio, LLC vets its upstream providers prior to accepting their traffic. FiberNet of Ohio, LLC obtains any potential upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the provider's business to determine whether they are a legitimate business. FiberNet of Ohio, LLC also confirms whether the upstream provider is identified in the Robocall Mitigation Database (to the extent required).

Although FiberNet of Ohio, LLC maintains unique agreements with each of its upstream providers, FiberNet of Ohio, LLC's agreements with upstream providers generally require each party to comply with applicable law (including FCC rules, regulations, and orders) and valid law enforcement requests, as well as cooperate with one another to investigate and minimize fraud, and allow for either party to terminate for breach. Further, certain agreements specify assistance and cooperation with law enforcement may include (1) establishing a 24/7 point of contact, (2) complying with requests for one-way denial of outbound calls, traces, or temporary disconnects, and (3) the parties exchanging information required to comply with law enforcement or other security agencies of the government. Certain agreements may also require the parties to exchange information regarding cross-network call-ins that are expected to generate large or focused temporary increases in call volumes, and the parties agree that the promotion of mass calling services are not in the best interest of either party. Finally, certain agreements may require each party to provide accurate calling party numbers associated with the originating customers, which reaches the proper end user to which it is assigned when dialed, has not been altered, and is not different than the originating number, among other specifications.

Acceptable Use Policy and Other Robocall Mitigation Measures

FiberNet of Ohio, LLC's Acceptable Use Policy applies to all customers using its IP services and prohibits use of such services in any way that is unlawful, harmful to or interferes with the use of FiberNet of Ohio, LLC network or systems, or the network of any other provider, interferes with the use or enjoyment of services received by others, or constitutes Spam/E-mail/Usenet abuse, among other prohibited uses. An example of Spam/E-mail/Usenet abuse under the Acceptable Use Policy includes sending messages that are harassing or malicious, or otherwise could reasonably be predicted to interfere with another party's quiet enjoyment of the IP services or the Internet (e.g., through language, frequency, or size). FiberNet of Ohio, LLC may suspend or terminate a customer's IP services for failure to observe its Acceptable Use Policy. FiberNet of Ohio, LLC engages the services of third-party fraud protection platform TransNexus to avoid originating, carrying, or processing illegal robocall traffic.

Traceback Commitment

FiberNet of Ohio, LLC commits to respond fully, within 24 hours, to valid traceback requests made by the Industry Traceback Group (ITG), U.S. government agencies (including the FCC), U.S. law enforcement, and to cooperate with such entities in investigating and stopping illegal robocallers that use FiberNet of Ohio, LLC service to originate, carry, or process illegal robocalls.

Ownership and Management

FiberNet of Ohio, LLC ultimate parent is Cox Enterprises, Inc. The chart attached hereto as **Exhibit A** depicts the ownership of FiberNet of Ohio, LLC and its affiliates. Information regarding FiberNet of Ohio, LLC management team can be found at [Segra - About Segra](#).

EXHIBIT A

Ownership Structure Chart

SEGRA OWNERSHIP



