



Robocall Mitigation Plan for Cable One VoIP LLC, 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.

Entity Covered by this Filing

Cable One VoIP LLC d/b/a Sparklight (FRN: 0024177222) (Sparklight)

Arizona

In Arizona, the Company relies on a third-party telecommunications carrier (Lumen) for services and functions related to the public switched telephone network (“PSTN”), including providing access to 911/E911, obtaining telephone numbers for use by the Company’s customers, converting interconnected VoIP service calls into the appropriate format for PSTN transmission, establishing relationships with other telecommunications companies, maintaining necessary communications transmission facilities, and transmitting interconnected VoIP calls to and from the PSTN as needed.

Sparklight has implemented STIR/SHAKEN in the IP portion of its network through a third-party, Lumen. Originating calls on the IP-portion of Sparklight’s network are signed with its certificate.

Extensions under FCC Rule 64.6304

Emporia, Kansas

For voice services provided in Emporia, Kansas, the Company is subject to an extension of the STIR/SHAKEN implementation requirements under FCC Rule 64.6304(d) for the non-IP portion of its network, and has implemented STIR/SHAKEN in the IP portion of its network.

A very small portion of the Company’s network in Emporia, Kansas can initiate, maintain, and

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terminate Session Initiation Protocol (“SIP”) calls. The Company has implemented STIR/SHAKEN in the small IP portion of its network in coordination with a third-party telecommunications carrier partner, **Peerless**. The Company has obtained the necessary SPC token and has implemented the various STIR/SHAKEN attestation levels.

For the remainder of the Company’s network in Emporia, Kansas, the Company is subject to an extension of the STIR/SHAKEN implementation requirements under FCC Rule 64.6304(d) because the non-IP portion of the Company’s network relies on technology that cannot initiate, maintain, and terminate SIP calls. The Company understands this extension ends once a caller ID authentication protocol has been developed for calls delivered over non-IP networks and is reasonably available.

The Company also understands the FCC may limit or terminate the extension if the FCC determines in a future assessment that a voice service provider is not making reasonable efforts to develop the call authentication protocol for non-IP networks as required under FCC Rule 64.6303. The Company, through its affiliates and industry associations, participates in industry groups working to develop a non-IP caller ID authentication solution.

Robocall Mitigation Plan

The Company has implemented specific measures to detect and prevent illegal robocalls on its network as of June 30, 2021. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described.

The Company offers voice services to business and residential customers. Its customers generally do not originate high volume calls and the Company has not received information suggesting that robocalls are originated by its customers. Therefore, the Company does not consider its network or its customers at high risk of originating illegal robocalls.

Customer Due Diligence: The Company has procedures in place to prevent new and renewing customers from originating illegal robocalls. The Company 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: The Company takes the following measures to prevent or avoid the origination of illegal robocalls:

- Customers are subject to enforceable terms of use and an acceptable use policy for use of all Company-provided services. These policies prohibit use of Company 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.
- The Company has implemented monitoring and reporting procedures designed to detect and prevent fraudulent traffic on its network.
- The Company uses a third-party analytics vendor Peerless Networks to score calls and monitor traffic on the Company’s network and identify potentially unlawful call origination activity. If the Company has a reasonable basis to believe that a customer

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is originating illegal robocalls, the Company will require the customer to remedy the problem and, if effective action is not taken, the Company can suspend and/or terminate service to the customer.

- The Company's telecommunications carrier partner also has in place monitoring and reporting procedures designed to detect and prevent fraudulent traffic on its network. If the telecommunications carrier partner detects possible fraudulent activity from a Company customer, the Company is notified immediately by its telecommunications carrier partner. The Company investigates all such notifications and takes appropriate action to stop the traffic if it is determined to be fraud.
- The Company has completed the "know-your-customer" screening process for its telecommunications carrier partner, and the Company is subject to provisions in its contracts with its telecommunications carrier partner that require the Company to take all necessary steps to prevent illegal robocalls on its network.
- If the Company 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

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

Primary Contact:

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

Secondary Contact:

Chris Davis
Manager, Voice Engineering
210 E. Earll Dr.
Phoenix, AZ 85012
Office Number: 843-686-1334
Chris.Davis@sparklight.biz
Business Hours: M-F 8am-5pm Eastern Standard Time

The Company also will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, the Company will:

- Respond to valid law enforcement requests;

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- 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

The Company is a wholly owned subsidiary of Cable One, Inc. d/b/a Sparklight (“Sparklight”), a publicly traded Delaware corporation. To Sparklight’s knowledge, no entity or individual owns ten percent (10%) or more of Sparklight as of the date of this filing.

In addition to the Company, the following are the FCC-regulated subsidiaries of 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
- Hargray Telephone Company, LLC d/b/a Sparklight
- Hargray, LLC d/b/a Sparklight
- ComSouth Telecommunications, LLC d/b/a Sparklight
- ComSouth Telenet, LLC d/b/a Sparklight
- Hargray of Alabama, LLC 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% interest in Mega Broadband Investments Holdings, LLC, and 45% of the membership interests in Mega Broadband Blocker, LLD (Glass 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.

As of July 1, 2025, the principals of the Company are:

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