

Robocall Mitigation Plan for
Fidelity Telephone Company 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

Fidelity Telephone Company LLC d/b/a Sparklight (FRN: 0002550309) (“Fidelity”)

Extension under FCC Rule 64.6304(d)

Fidelity offers voice and broadband Internet access services in the state of Missouri.

Fidelity 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. Fidelity has implemented STIR/SHAKEN in the IP portion of its network.

The non-IP portion of Fidelity’s network relies on technology that cannot initiate, maintain, and terminate SIP calls. Fidelity understands it is required to comply with the requirements of 47 CFR § 64.6303 as to the portion of its network subject to the extension. In accordance with 47 CFR § 64.6303, Fidelity 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. Fidelity understands this extension ends once a caller ID authentication protocol has been developed for calls delivered over non-IP networks and is reasonably available.

Robocall Mitigation Plan

Fidelity has implemented specific measures to detect and prevent illegal robocalls on its network as of June 1, 2020. Fidelity will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described.

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

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Customer Due Diligence: Fidelity has procedures in place to prevent new and renewing customers from using the Fidelity network to originate illegal robocalls. Fidelity 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: Fidelity takes the following measures to prevent or avoid the origination of illegal robocalls:

- Fidelity customers are subject to enforceable terms of use and an acceptable use policy for use of all Fidelity-provided services. These policies prohibit use of Fidelity 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.
- Fidelity has implemented monitoring and reporting procedures designed to detect and prevent fraudulent traffic on its network.
- Fidelity utilizes a robocall mitigation solution from Neustar, which is designed to leverage the existing Caller ID Name infrastructure and data analytics to detect and warn customers on their devices of suspect, robocall activity. The service is automatically provided to Fidelity customers free of charge. Neustar analytics identify patterns of suspected illegal robocalls and score these calls based on their behavior and/or their status as suspected robocalls as reported to the FCC or Federal Trade Commission, or as reported by other carriers. For telephone numbers identified as having a high probability of conducting fraudulent activity, the response to a Caller Name (CNAM) query is overlaid with an appropriate alert – “SPAM?” or “Fraudulent Call.” Fidelity also receives relevant call analytic information from some of its other third-party vendors, such as its Carrier Access Billing System (CABS) vendor.
- Fidelity has completed the “know-your-customer” screening process for the carriers to which it interconnects. Fidelity is subject to provisions in its interconnection and commercial agreements that require Fidelity to take steps to prevent illegal robocalls on its network.
- If Fidelity 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

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

Primary Contact:
Scott Adams
Voice Operations Manager
Cable One, Inc.
210 E. Earll Dr.

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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 of Voice Engineering
Cable One, Inc.
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

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

Fidelity 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 Fidelity:

- Cable One VoIP 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

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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 (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.

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 Fidelity 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 & Treasurer
- Christopher J. Arntzen, Secretary