

RCN Telecom Services, LLC
RCN Telecom Services (Lehigh) LLC
RCN Telecom Services of Massachusetts, LLC
RCN Telecom Services of New York, LP
RCN Telecom Services of Philadelphia, LLC
RCN Telecom Services of Illinois, LLC
Starpower Communications, LLC
Grande Communications Networks, LLC
WaveDivision Holding, LLC
Astound Broadband, LLC
ETS Telephone Company, Inc.
Digital West Networks, Inc.
Blue Rooster Telecom, Inc.
Norcast Communications Corporation

Robocall Mitigation Plan V.2 June 2023

STIR/SHAKEN IMPLEMENTATION

RCN Telecom Services, LLC and the affiliated entities listed above (collectively, “RCN” or individually “Company”) will have STIR/SHAKEN implemented on calls using IP trunking prior to the June 30, 2021 deadline. Pending availability of STIR/SHAKEN solutions for non-IP traffic, RCN companies implement the following Robocall mitigation plans,

ROBOCALL MITIGATION

Background

The FCC Order lists three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

1. Traceback:

Traceback requests should be presented via the Company’s Technical Assistance Center (TAC). The TAC will create a tracking ticket and route the request to the appropriate department for investigation. The request will be investigated using logs, CDRs and diagnostic applications provided by Metaswitch, Empirix, Cordel, and Equinox. If or when the call activity is found, it will be evaluated for common robocalling markers and non-valid caller ID information. Customer follow up will be pursued as indicated. The Company will report its status and findings to the requestor per FCC guidelines.

Traceback Contact Information

Name	Title	Contact Information
Technical Assistance Center (TAC)		Ph: 888-972-6622 Email: TAC@rcn.net

2. Take Steps to Mitigate Illegal Traffic

Customer contracts include terms prohibiting customers from using the Company's network to generate illegal activity. If suspect call activity is found, customer follow up will be pursued as indicated. If the customer is unwilling or unable (in the event the system has been compromised by an outside party) the company will implement steps to block the traffic in the Company's central office switch.

3. Measures to prevent origination of illegal calls

Know Your Customer:

The Company's standard contract terms and conditions, which all commercial customers must accept in order to receive communications services from RCN, expressly prohibit customers from using the Company's communications services to make unauthorized robocalls or robotexts.

Telephone Number Validation:

Customer voice service configurations, where the customer has the ability to manipulate the Call ID signaled with outbound calls, are set by default for screening to only allow telephone numbers provided by the Company. If the customer wishes to send a telephone number or 8xx number provided by another carrier, the request is evaluated, and the customer is asked to provide validation that they have a legitimate reason to use requested telephone numbers.

Network Monitoring:

Exception and threshold reports using logs, CDRs and diagnostic applications provided by Metawswitch, Emprix, Cordel, and Equinox are being used and further developed to identify call patterns that may imply possible robocalling.

Call Blocking:

The company will analyze suspect traffic related to observed call patterns and/or customer trouble reports. Reputation databases will be checked for reports related to the calling number. If the proactive blocking is indicated, the caller will be blocked in switch translations tables. A ticket will be opened with the sending carrier requesting an investigation of the suspect call traffic.

The Company will check the RMD semi-monthly to verify that all directly interconnected carriers are adhering to applicable FCC regulations. The Company will be prepared to block carriers if indicated.

4. Acceptable Use Policy

In addition to contract terms limiting service to legitimate purposes, the Company has prepared an Acceptable Use Policy ("Policy") as a guide for its customers to understand the intended and permissible uses of our service, and to prevent exploitation, fraud, and abuse of our unlimited calling plans and features. This Policy is applicable to all our services and can be found at the following link: [acceptableusepolicy.pdf \(rcn.com\)](#).

CONCLUSION

The Companies listed above submit this robocall mitigation plan, which is designed to comply with the Federal Communications Commission's Fourth Report and Order (FCC 20-187). This plan is a work in progress and will be supplemented as the company gains more exposure to and experience with these processes.