

Robocall Mitigation Plan

Business Information

Name of Business – Stellar Private Cable Systems, Inc.

Address of Business – 975 E Tallmadge Avenue, Akron, OH 44310

Contact Information

Contact Person – Tracy Hulse

Title – Managed Services Team Lead

Address – 975 E Tallmadge Avenue, Akron, OH 44310

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Know Your Customer

New Customers

Residential Customers – N/A

Small Business Customers – Use of Contract Cover Sheet to obtain and record physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.

Enterprise Customers – use of Contract Cover Sheet to obtain and record physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business. Wholesale Customer – N/A

Domestic Call Center Customers - N/A

Foreign Customers, Including Call Center Customers and Customers Using NANP Numbers – Use of Contract Cover Sheet to obtain and record physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.

Existing Customers

All Customers – require updates of Customer Information on an annual basis.

All Enterprise Customers, Wholesale Customers, Domestic Call Center Customer Customers and Foreign Customers (subject to periodic or random checks of traffic originating from their TNs against known robocallers and robocall characteristics)

Wholesale Customers, Domestic Call Center Customer Customers and Foreign Customers (contractual agreement to identify "upstream" source of illegal calls on their networks, to identify their own customers who originate illegal calls, and proof of registration in the FCC's Enforcement Database)

Mitigation Through Contracts

All Customers agree to participate in traceback requests per Contract Cover Sheet

Wholesale Customers – N/A

During Service

Existing Customers

All Customers (Caller ID and Blocking – provide free and easy access for individual customers to block calls from individual numbers, communicate regularly with customers to advise them of the tool and how to use it, and update this and related systems regularly for all customers)

Wholesale Customers – N/A

Ensure there are no line item charges for robocall mitigation on customer bills.

Monitor Traffic with Analytics

Dynamic Traffic Analysis can identify behaviors which indicate illegal call activity, such as intermittent bursts of high activity, suspiciously low call completion rates/short call times, and evidence of systematic calling, or “war dialing.” Abnormally high-volume call patterns from a commercial customer are a common symptom of illegal robocalling. Illegal call originators can sometimes be identified by examining Call Detail Records and checking numbers dialed against the National Do Not Call Registry

Currently working with Metaswitch to implement STIR/SHAKEN Robocall Blocking Service.

Existing Customers (with special emphasis on Enterprise, Wholesale, Call Center and Foreign Customers)

Inbound calls to our SIP network are sent to the Metaswitch cloud native Robocall blocking service. They are then queried against a reputation provider to confirm the caller is genuine. The call is then forwarded on in genuine or blocked if determined it is from a robocaller.

Our reputation data is constructed from multiple sources, but publicly available and industry robocall lists. The data is dynamically updated spam scores are undated in real time.

Investigate Suspicious Activity

Existing Customers (with special emphasis on Enterprise, Wholesale, Call Center and Foreign Customers)

As notified by the Metaswitch cloud service, we will investigate source IP addresses used to perform the violating calls. We will then be able to notify the relevant law enforcement agencies based on the source IP location.

After Service Has been Used for Illegal Robocalling

Existing Customers

Cooperate with Investigative Bodies (provide a single point of contact to address traceback) requests from law enforcement (including the state attorney general's office), the FCC, or the Industry Traceback Group; document requests & actions taken in response thereto.