

CableCo LLC – Robocall Mitigation Plan

CableCo LLC (Cable Co) is a toll reseller, and all customers are served on an IP network.

CableCo originates calls within its network via SIP connection. CableCo has registered with the Policy Administrator (via its affiliate Rye Telephone Company, Operating Company Number 2203) and is an authorized service provider in the STIR|SHAKEN ecosystem. CableCo has implemented STIR|SHAKEN within its IP-network and signs all calls originating on the network.

Robocall Mitigation Plan

CableCo has taken reasonable steps and has mitigation processes in place to recognize and to ultimately reduce the origination of illegal robocalls on our network and continuously works to expand and enhance them. All voice traffic that originates on CableCo network is subject to the following Robocall Mitigation Plan.

Policing and Monitoring

- Continuous internal monitoring and analyzation of originating call detail records to identify anomalies and abnormalities that conflict with our established baselines of normalcy. Our baselines of normalcy are established over years of analyzing voice traffic on our network and the typical behavior of our voice subscribers. Using this historical data, past and present, we can easily identify potentially malicious behavior and act quickly to qualify legitimacy and mitigate when necessary. Mitigation may include subscriber services termination.
- Participation in Domestic Toll Fraud mitigation with one of our strategic partners that is designed to specifically identify and mitigate robocalls and call pumping. This domestic toll fraud mitigation actively monitors area codes and OCN's with a history of illegitimate intent and has technical processes in place to flag and block calls based on unusual activity. Some of the unusual activities include frequency of calls to one number in short periods of time (call pumping) and the length of calls, etc.
- We monitor our IP network utilizing state of the art network monitoring tools to identify abnormalities within our Session Border Control and throughout our voice delivery network. We block offending IP's and phone numbers as we identify abuse participants.
- We have tight security measures in place to prevent unauthorized access to subscriber phones and voicemail.

Know Your Customers - Acceptable Use Policy:

- CableCo has standard practices of confirming that businesses are legitimate and have legitimate, normal, and well-intended interest in the use of our voice services prior to permitted use.
- All subscribers are subject to vetting of their identity and legitimacy which includes:
 - Physical business location
 - Contact person responsible for the account
 - State or County of incorporation
 - Nature of customers business

Upstream Provider Knowledge

- CableCo knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database.
- CableCo monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity.
- The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked from entering CableCo's network.
- No provider is using CableCo's network to carry or process a high volume of illegal traffic.
- In addition, CableCo is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers

Traceback and Communications

- CableCo has a dedicated contact for receiving communications or points of concern for traceback investigations.
- CableCo commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls.
- CableCo will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.
- CableCo posts our RMP for the public on our websites and allow our customers to opt in and opt out of our blocked call program.

Principals, Affiliates, Subsidiaries, and Parent Companies

- ITC Broadband Holdings, LLC (Parent)
- ITC Broadband Capital, LLC (Parent)
- ITC Fiber Holdings, LLC (Parent)
- ITC Rural Connect, Inc. (Parent)
- ITC Broadband Operating, LLC (Parent)
- Aspire Networks 1, LLC (Affiliate)
- US Connect Holdings, LLC (Parent)
- The Livingston Telephone Company, LLC (Affiliate)
- Telcom Supply, LLC (Affiliate)
- USConnect Acquisitions II, LLC (Affiliate)
- S&A Telephone Company, LLC (Affiliate)
- Mid-South Cellular, LLC (Affiliate)
- S&A Communications, LLC (Affiliate)
- Waverly Hall Communications, LLC (Affiliate)
- Waverly Hall Telephone, L.L.C. (Affiliate)
- Highline Colorado, LLC (Parent)
- Corona Holdings, LLC (Direct Parent)
- The Rye Telephone Company, LLC (Affiliate)
- South Park L.L.C. (Affiliate)
- USConnect Acquisitions IV, LLC (Affiliate)
- Newcastle Holdings, LLC (Affiliate)
- Elsie Communications, LLC (Affiliate)
- Dalton Telephone Company, LLC (Affiliate)
- Dalton Telecommunications, LLC (Affiliate)
- Highline Services, LLC (Affiliate)