

CUSTOM CABLE LLLP.

Federal Communications Commission
Robocall Mitigation Plan

Amended and Implemented: December 26, 2024

**Custom Cable LLLP.
Robocall Mitigation Plan**

Table of Contents

I. Robocall Mitigation Plan Introduction.....	3
A. Company Summary	3
B. Identification of STIR/SHAKEN Extension Category	3
C. Elements of the Company’s Robocall Mitigation Plan.....	4
II. Robocall Mitigation Plan	4
A. Customer Onboarding and Know Your Customer Protocols	4
B. Contractual Provisions to Mitigate Origination of Illegal Robocalls	5
C. Analyzing and Monitoring Network Traffic.....	6
D. Investigating Suspicious Calling Patterns.....	6
E. Participation in the Industry Traceback Group.....	7
F. Adoption of Various Government and Industry Anti-Robocalling Principles	7
G. Designated Employee Responsible for Addressing Robocall Mitigation-Related Issues ...	8
H. Employee Training.....	8
Exhibit A – Company Information	9
Exhibit B – Custom Cable Principals.....	10

I. Robocall Mitigation Plan Introduction

Consistent with the rules and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following Robocall Mitigation Plan details the policies and practices that Custom Cable LLLP., on behalf of itself and its subsidiaries and affiliates (see Exhibit A) (collectively “Custom Cable” or the Company), has established to prevent unlawful robocalls from originating on its voice network. This Robocall Mitigation Plan applies to all of Custom Cable’s calling platforms. This Robocall Mitigation Plan provides information on Custom Cable’s policies and procedures for:

1. Customer onboarding / know your customer (“KYC”);
2. Implementation of contractual terms;
3. Analyzing and monitoring outbound network traffic;
4. Investigating suspicious calling traffic and patterns;
5. Cooperating in traceback requests;
6. Implementing industry robocall mitigation standards;

Custom Cable LLLP. Robocall Mitigation Plan

7. Designating an employee responsible for addressing robocall mitigation-related issues; and
8. Training of personnel.

A. Company Summary

Custom Cable is a privately owned company headquartered in Miami, Florida, with the primary address 7280 NW 7th Street, unit #103, Miami FL, 33126. The Company was founded in 2002 and provides services over a fiber-optic network it owns and operates. Custom Cable offers services to residential Voice over Internet Protocol (“VoIP”) subscribers in Florida. Custom Cable is not a foreign voice service provider. Its principals are identified in Exhibit B of this Robocall Mitigation Plan.

B. Identification of STIR/SHAKEN Extension Category

Custom Cable is a voice service provider with a STIR/SHAKEN implementation obligation serving end users. Custom Cable does not meet any STIR/SHAKEN extension categories under the FCC’s rules and has implemented the STIR/SHAKEN standard.

C. Elements of the Company's Robocall Mitigation Plan

The Company's Robocall Mitigation Plan contains the following elements:

1. Customer Onboarding and Know Your Customer Protocols
2. Terms and Conditions of Agreements
3. Analyzing and Monitoring Network Traffic
4. Investigating Suspicious Calling Patterns
5. Participation in the Industry Traceback Group
6. State Attorneys General Anti-Robocalling Principles
7. Designated Employee Responsible for Addressing Robocall Mitigation-Related Issues
8. Employee Training

II. Robocall Mitigation Plan

A. Customer Onboarding and Know Your Customer Protocols

Custom Cable requires enterprise and residential customers, in certain instances, to complete a Letter of Authorization ("LOA"). The LOA form requests various customer information—including information about the ownership of the customer's number(s) and who holds authorization for the transfer and/or management of the number(s). Custom Cable's onboarding process for residential subscribers also includes training and support for Custom Cable's voice-related services.

Residential Customers. For its residential subscribers, Custom Cable validates legal addresses through a third-party vendor before onboarding a customer. In cases where insufficient address information is provided, the vendor will provide Custom Cable with an error code. Custom Cable also conducts identity checks for residential customers when they start service. It includes searching its internal systems to determine if any new or renewing customers have a previous outstanding balance or bad debt. Custom Cable prohibits unlawful use of Custom Cable's services and will promptly terminate a customer for such unlawful use.

Know Your Upstream. Custom Cable has a Tier 1 provider to facilitate all voice traffic originating on or terminating to the Custom Cable network, and the relationship with this established provider involves strong contractual terms. One of these providers also provides Telephone Number Inventory and Local Number Portability functions for telephone number porting to Custom Cable.

**Custom Cable LLLP.
Robocall Mitigation Plan**

B. Contractual Provisions to Mitigate Origination of Illegal Robocalls

Residential voice service customers of Custom Cable are subject to terms and conditions that generally (1) obligate customers to use Custom Cable's services in compliance with existing laws; and (2) preserve Custom Cable's discretionary right to terminate customers for actual and potential violations of the law.

Custom Cable's agreements provide that Custom Cable may terminate its service to a customer if: (1) the customer is using the service in violation of the tariff; or (2) the customer is using the service in violation of the law.

Custom Cable also maintains a VoIP Consumer Service Agreement requiring its customers to "not use the Services, the Products, or any facilities or equipment of Custom Cable in any unlawful way or for any unlawful purpose." Custom Cable may "terminate or suspend the Services at its sole discretion, at any time, for any material noncompliance with [the VoIP Consumer Service Agreement], including but not limited to, failure to pay any or all amounts due, rejection of any form of payment, *violation of any legal requirement*, suspected or actual fraud or misrepresentation or commercially reasonable suspicion thereof, or Customer's bankruptcy, insolvency, assignment for benefit of creditors, or any similar action."

C. Analyzing and Monitoring Network Traffic

Custom Cable has policies and procedures governing the analysis and monitoring of its outbound network traffic. Consistent with Principle #3 of the "Anti-Robocall Principles for Voice Service Providers," Custom Cable analyzes voice network traffic originating from its network on a daily basis to identify and monitor patterns consistent with illegal robocalls.

As part of its analysis and monitoring of network traffic, technical support staff provide oversight of Custom Cable's voice service operations. Custom Cable's NOC operates M-F 8a-6:30pm and monitors Custom Cable's network traffic for anomalies that may indicate illegal robocall traffic. Custom Cable can also analyze its call detail records ("CDRs") and verify outbound traffic using either the Transnexus Real-Time Anti-Fraud platform or Sansay Session Border Controllers Real-Time Service Monitor (RSM) and Proactive Service Monitor (PSM). If suspicious traffic is detected, the NOC generates tickets to resolve the issue and reaches out to parties originating such traffic to determine the cause. If a ticket needs engineering support outside of 9 am to 5 pm, Monday through Friday hours, the Custom Cable Voice Engineering team has a Standard Operating Procedure to escalate any issue involving service impacts, fraud, and internal and external investigations.

D. Investigating Suspicious Calling Patterns

When Custom Cable identifies instances of suspicious traffic on its network or is notified by the FCC, the Industry Traceback Group ("ITG"), or law enforcement about such traffic, the Custom Cable Voice Engineering team engages the appropriate internal Custom Cable

Custom Cable LLLP. Robocall Mitigation Plan

stakeholders and/or legal counsel to implement a mitigation plan to stop or block such traffic from the end users/subscribers consistent with Custom Cable's Terms of Service. Because Custom Cable has a single downstream provider, it may also engage with it to identify and mitigate suspicious traffic. Custom Cable works cooperatively with its downstream provider to identify potentially problematic end users/subscribers and/or telephone number(s) associated with suspect traffic.

E. Participation in the Industry Traceback Group

Custom Cable takes the issue of unwanted and illegal robocalls seriously and is committed to ensuring that its network is not utilized for the origination of such calls. Custom Cable will respond fully and promptly to all traceback requests from the Commission, law enforcement, and the FCC's designated Traceback Consortium and will cooperate with such entities in investigating and mitigating illegal robocalls. Additionally, Custom Cable has not been the subject of a formal Commission law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient RMD certification or mitigation program description within the past two years.

Custom Cable will respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. It will cooperate with such entities to investigate and stop illegal robocallers using its service to originate calls. Custom Cable is solely a voice Service Provider with a STIR/SHAKEN implementation obligation serving end users and does not act as a non-gateway intermediate provider or gateway provider.

F. Adoption of Various Government and Industry Anti-Robocalling Principles

Custom Cable has adopted and implemented various government and industry best practices that focus on mitigating illegal robocalls. Custom Cable is guided by the 2019 State Attorneys General anti-robocall principles for voice service providers and the Industry Traceback Group's Policies and Procedures and has committed to analyzing and monitoring its network traffic, investigating suspicious calls and calling patterns, confirming the identity of its commercial customers, and cooperating in traceback investigations.

G. Designated Employee Responsible for Addressing Robocall Mitigation-Related Issues

The name, title, department, business address, telephone number, and email address of the person within Custom Cable responsible for addressing robocall mitigation-related issues, including traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies, is as follows:

Contact Name: Jaile Lima
Contact Title: General Partner
Contact Street: 7280 NW 7th Street Unit 103
Contact City: Miami
Contact State and Zip Code: FL 33126
Contact Telephone Number: (305) 467-6927
Contact Email: jaile@customcable.tv

H. Employee Training

Lastly, Custom Cable has implemented a training program to ensure that employees receive appropriate training on issues related to illegal robocalls. Each customer support member of Custom Cable will receive a copy of this Robocall Mitigation Plan for their review and records. Custom Cable's Human Resources department will also include this Robocall Mitigation Plan in its package of policy documents and other relevant materials distributed to relevant employees. Through this approach, Custom Cable will seek to ensure that each of its employees is aware of the contents of this Robocall Mitigation Plan, thereby increasing its effectiveness.

Exhibit A – Company Information

Company Name	FRN	DBA and “Formerly Known As” Names
Custom Cable LLLP.	0031448285	Custom Cable Corp

**Custom Cable LLLP.
Robocall Mitigation Plan**

Exhibit B – Custom Cable Principals

As of the last updated date of this Robocall Mitigation Plan, Custom Cable’s principals are as follows:

Name	Title
Jaile S. Lima	General Partner
Alain Carrazana	General Partner