



COMCAST

Comcast OTR1, LLC
Robocall Mitigation Plan

Introduction

This document details the “reasonable steps” that Comcast OTR1, LLC (“Comcast OTR1”) has taken to avoid the origination of illegal robocall traffic as part of its robocall mitigation program.

Comcast OTR1 is a mobile virtual network operator (“MVNO”) that resells the service of underlying mobile network operators to consumers under the “Xfinity Mobile” product name and to businesses under the “Comcast Business Mobile” product name. As an MVNO, Comcast OTR1 operates as a reseller; it does not own or operate the voice networks associated with its service, nor does it have access to the underlying networks for monitoring, detection, or authentication activities. {{BEGIN CONFIDENTIAL}}

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Comcast OTR1 works closely with its underlying network providers to ensure that customers of Xfinity Mobile and Comcast Business Mobile receive the benefits of the robocall mitigation, call authentication, and other related activities performed with respect to the underlying network. Comcast OTR1 also undertakes various efforts of its own, described below, to identify and disqualify individuals and businesses as customers that are likely to be associated with illegal robocalls; to pre-qualify prospective customers that are unlikely to generate illegal robocalls; and to monitor existing customers for activities indicative of the potential for transmitting illegal robocalls.

Comcast OTR1 is committed to cooperating as needed with its underlying network providers in responding fully and within 24 hours to all traceback requests from the Commission, law enforcement agencies, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocallers that use Comcast OTR1’s service to originate calls.

A. Know Your Customer

Comcast employs a variety of know your customer initiatives, tailored according to service type and customer type and (for businesses) size.

Both Xfinity Mobile and Comcast Business Mobile employ a sales discovery process to pre-qualify customers and minimize the risk of accepting as customers individuals or entities likely to engage in illegal robocalling. Because many prospective customers already have a relationship with Comcast prior to purchasing Xfinity Mobile or Comcast Business Mobile service, the company often can rely on the base of knowledge gathered by internal partners and included in the customers’ existing account records to undertake this pre-qualification process. In all events, the company confirms the contact details and related information provided by prospective customers via national credit reporting agencies. Moreover, sales agents are provided with materials to assist them in evaluating the potential for a prospective customer to use the service to engage in illegal robocalling, rather than only for legal purposes.

Customers’ use of Xfinity Mobile and Comcast Business Mobile service is governed by an

Acceptable Use Policy (“AUP”), which prohibits the use of auto-dialers, telemarketing, advertising, or other forms of commercial solicitation, among other illegal, fraudulent, threatening, or abusive activities, and informs customers that Comcast OTR1 and its partners reserve the right to monitor a customer’s calling activity, and to take appropriate action, including suspension, termination, or permanent disconnection of service, in the event that a violation of the AUP occurs.

Customers of Xfinity Mobile and Comcast Business Mobile also are required to sign customer agreements that likewise prohibit use of the service in any manner that has the potential to cause harm to the network or other users or that is unlawful, and in which Comcast OTR1 reserves the right to take remedial action if customers engage in behavior that violates the AUP and other terms and conditions of the service, including robocalling and other forms of abusive calling.

B. Know Your Upstream Provider

As noted above, Comcast OTR1 is an MVNO; it operates as a reseller of voice services and does not own or operate the network associated with its service. Accordingly, the underlying network providers, as the owners and operators of the networks, not Comcast OTR1, exchanges voice traffic with third parties, {{BEGIN CONFIDENTIAL}} [REDACTED] {{END CONFIDENTIAL}}

C. Analytics-Based Tools and Other Robocall Mitigation Techniques

Customers of Xfinity Mobile and Comcast Business Mobile benefit from various robocall mitigation efforts undertaken by Comcast OTR1 and its underlying network providers, including:

Call Guard App. The Xfinity Call Guard app, available to certain customers, offers features such as real-time spam alerts, treatment options for potential spam calls—e.g., blocking or sending such calls to voicemail and “neighborhood” filters to block numbers similar to the customer’s own—verified branded calling to identify legitimate businesses, a personal block list, and a whitelist (to ensure that particular numbers bypass spam filters).

Call Filter Tools. Customers of Xfinity Mobile and Comcast Business Mobile also benefit from the underlying network providers’ call filtering tools, which enable customers to screen incoming spam calls, block (i.e., send directly to voicemail) calls by risk level, and report numbers as spam. In addition, the tools label numbers considered “risky” as “Spam” on customers’ caller ID displays.

Call Authentication Technology. Comcast OTR1 operates as a reseller of the voice component of the service and lacks control of any network infrastructure and facilities necessary to implement STIR/SHAKEN. Comcast OTR1 does not own or operate the network associated with the voice service, nor does Comcast OTR1 have access to the underlying network for monitoring, detection, or authentication activities. Accordingly, Comcast OTR1 is subject to an exemption from compliance with the STIR/SHAKEN implementation obligations for voice service providers in 47 C.F.R. § 64.6301(a). *See Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 2573 ¶ 45 (2023); *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources*, Report and

Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241 ¶ 40 (2020); *see also* 47 C.F.R. § 64.6304. Nevertheless, due to the underlying network providers' implementation of STIR/SHAKEN, calls originating from customers of Xfinity Mobile and Comcast Business Mobile are signed in accordance with FCC rules and orders, and inbound STIR/SHAKEN-signed calls are verified in accordance with FCC rules and orders.

Network-Level Blocking. All network-level blocking of harmful traffic performed by the underlying network providers prevents such calls from reaching Xfinity Mobile and Comcast Business Mobile customers.

Traffic Monitoring. Comcast OTR1 works with internal partners and its underlying network providers to continuously review customer traffic and identify and address potential instances of abuse. For example, if a customer's account reflects excessive call volumes relative to a typical user, Comcast OTR1 may further review the customer's calling patterns and volumes to identify additional indicators of illegal robocalling, e.g., excessive short-duration outbound calls and calls made to numerically consecutive numbers, and take appropriate action to address instances of robocalling and other forms of abusive calling.

Principals, Affiliates, Subsidiaries, and Parent Companies

Comcast OTR1, LLC is a wholly owned subsidiary of Comcast Corporation, a publicly traded corporation whose Chairman is Brian Roberts and whose Co-Chief Executive Officers are Mr. Roberts and Michael Cavanagh.

Affiliates of Comcast OTR1, LLC that are voice service providers and filers in the Robocall Mitigation Database are as follows:

Comcast IP Phone, LLC
Comcast Phone of California, LLC
Comcast Phone of Texas, LLC
Masergy Cloud Communications, Inc.
Midcontinent Communications
Network Innovations, LLC