



Robocall Data Mitigation Plan

One Communications

Pursuant to 47 C.F.R. § 64.6305, Bermuda Digital Communications Ltd. d/b/a One Communications or OneComm on behalf of itself and its affiliates Cedar Cable Ltd. and Logic Communications Ltd. (collectively "OneComm"), submit this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls, as of February 17 2026. OneComm reserves the right to modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time as it deems appropriate to reflect its business, its capabilities, and its needs.

OneComm is a voice service provider in Bermuda, providing mobile telephone service and through its affiliates, wireline telephone, internet and cable TV services to residential and business customers. OneComm is not, and really cannot be, a significant source of U.S. robocalls. Nevertheless, OneComm has implemented a Robocall Mitigation Program for its entire operation and OneComm has deployed protections designed to ensure that it remains free of illegal robocalls on its network.

STIR/SHAKEN Implementation

OneComm will comply fully with all conditions set forth in the FCC's orders, rules, and policies regarding the implementation of the STIR/SHAKEN framework including the First Call Authentication Report and Order and Second Call Authentication Report and Order.¹

OneComm continues to exchange some of its traffic on the non-IP portions of its network as our access and interconnection arrangements are TOM-based. Under the FCC's rules, OneComm is not required to implement STIR/SHAKEN for these calls at this time. However, as described below, OneComm has implemented a Robocall Mitigation Plan for these and other calls it delivers over its network.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that OneComm has implemented to detect and prevent illegal robocalls on its network as of February 26, 2024. OneComm is not a significant source of illegal robocalls at this time and has tailored its robocall mitigation practices to address the areas most at risk of involving illegal robocalls. The measures described below explain how OneComm mitigates and addresses the risk it experiences. OneComm will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the

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Call Authentication Trust Anchor; Implementation of TRACED Act Section 6(a)-Knowledge of Customers by Entities with Access to Numbering Resources, WC Docket Nos. 17-97 and 20-67, Report and Order and Further Notice of Proposed Rulemaking, FCC 20-42 (rel. Mar. 31, 2020); Call Authentication Trust Anchor, WC Docket Nos. 17-97, Second Report and Order, FCC 20-42 (rel. Oct. 1, 2020).

measures described. Should it determine that changes are appropriate, its practices may differ from those described below.

Traceback Requests

Pursuant to 47 CFR § 64.6305(d)(4)(v), OneComm has designated a point of contact to receive notice of any incidents of illegal robocall traffic. The person's name, title, address, phone number, and email address are in the RoboCall Mitigation Database portal. This individual will be the main contact responding to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. OneComm is committed to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Subscriber Vetting Processes

OneComm will vet the identity of residential, retail, and wholesale subscribers through normal business practices and will obtain service address information. OneComm will complete an additional review of any outbound call centers or high-volume origination services within its network that may include a stricter application review process.

Telephone Validation Processes

A subscriber is permitted to use a telephone number as their caller identity, if a number is directly managed by OneComm and/or obtained by OneComm via an underlying partner. OneComm has established a process for ensuring subscribers are utilizing only telephone numbers assigned to them or have been authorized to use.

Network Monitoring Mitigation

OneComm through its affiliates analyzes and monitors network to identify and monitor patterns consistent with robocalls. OneComm will take appropriate action to identify any party that is suspected of illegal robocalling or spoofing over its network. OneComm works with third-party affiliates to use analytics to identify the origination or termination of illegal robocalls. OneComm is utilizing a caller authentication service. OneComm utilizes an end-to-end technology solutions organization, that provides a Caller Identification Authentication (CIDA) service which includes Outbound Shield technology. This Outbound Shield uses a curated list of high-risk phone numbers and detects invalid numbers. If the calling number has been reported as spam, the calling number will be prevented from completing outbound calls.

Know-Your-Upstream Provider

OneComm knows all the carriers from which it receives traffic and has confirmed that all carriers in which it exchanges traffic and from which it receives traffic are listed in the Robocall Mitigation Database. Basic identification information, such as physical business location, contact person(s), state of incorporation, and nature of business, are collected for all of the OneComm's up-stream providers.



Going forward, all interconnection agreements will include prohibited traffic and traceback language.

Do Not Originate

Pursuant to 28 U.S.C. § 1746, that the telephone number(s) referenced in my STIR/SHAKEN filing did not originate any of the calls associated with the unlawful, fraudulent, or otherwise unauthorized activity described in the accompanying complaint. Any call that appears to have originated from this number was made without the knowledge, consent, or authorization of the lawful subscriber and constitutes unlawful caller ID spoofing in violation of the Truth in Caller ID Act (47 U.S.C. § 227(e)) and the Federal Communications Commission's implementing rules at 47 C.F.R. § 64.1604.

Pursuant to FCC requirements governing caller ID authentication and robocall mitigation under the STIR/SHAKEN framework (47 C.F.R. § 64.6300 et seq.), I affirm that the legitimate subscriber or owner of the number did not place, direct, permit, authorize, or otherwise participate in any of the calls in question. Any such call traffic is the result of misuse by an unauthorized third party and is inconsistent with the obligations imposed on voice service providers to prevent illegal spoofing and unlawful call origination.

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Commnet Wireless, LLC	James Ellison	Assistant Treasurer	Assistant Treasurer
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