

Optimum Communications, Inc. Robocall Mitigation Plan

Pursuant to 47 C.F.R. § 64.6305, Optimum Communications, Inc., f/k/a Altice USA (“Optimum”) submits this robocall mitigation plan describing the reasonable steps implemented to avoid originating or transmitting illegal robocall traffic on the networks operated by its subsidiaries that are voice service providers. In particular, this plan reflects the practices of the following entities:^{1/}

Name of Voice Service Provider (“VSP”)	VSP FCC Registration Number	Operating Company Number (“OCN”)
OV LLC	0019532621	
NY OV, LLC	0019532639	
Cablevision LightPath LLC	0029801321	7126 472K
Cablevision Lightpath CT LLC	0022322481	4950
Cablevision Lightpath NJ LLC	0022322465	4948
Lightpath New England, LLC	0030836043	814J
CSC Wireless, LLC	0027517473	425J
CSC Wireless NY, LLC	0027517648	
Mercury Voice and Data, LLC	0020989935	226H Nevada: 590H Missouri: 159E Arizona: 227H
NPG Digital Phone, LLC	0017024100	
TCA Communications, LLC	0014795819	048G
Cebridge Telecom CA, LLC	0014742308	388E
Cebridge Telecom KS, LLC	0016746869	224H
Cebridge Telecom TX, L.P.	0004330288	318C
Cebridge Telecom KY, LLC	0016746885	238H
Cebridge Telecom LA, LLC	0014742282	260H
Cebridge Telecom MS, LLC	0016746893	223H
Cebridge Telecom NM, LLC	0016746901	243H
Cebridge Telecom NC, LLC	0015179427	703F
Cebridge Telecom OH, LLC	0016746919	225H
Cebridge Telecom OK, LLC	0014742266	390E
Cebridge Telecom, VA, LLC	0014854533	229H
Cebridge Telecom WV, LLC	0014854517	391E

^{1/} The Commission will note that a subsidiary of Optimum Communications, Inc. – Cablevision Lightpath Inc. (now Cablevision LightPath LLC) previously submitted a certification in the Robocall Mitigation Database intending to cover its operations and the operations of other entities that are affiliated with Optimum. While that submission was accurate and appropriately identified the entities included, Optimum has determined that it would be more appropriate for it to submit this certification and Robocall Mitigation Plan on behalf of itself and affiliated entities.

CSC Voice, LLC	0032580698	612K
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Optimum is the majority owner of the above-listed voice service providers. These entities provide voice services to end-users; Optimum does not provide voice services itself. Those entities operate under the tradenames Optimum Voice, Optimum Mobile, Lightpath, and Suddenlink Communications. All calls originated or terminated by any of the above-listed voice service providers are routed through the network operated by OV LLC and NY OV, LLC (“Optimum Voice”), with the exception of local-to-local calls originated by or terminated by customers of Cablevision LightPath LLC (“LightPath”).² Those calls transit exclusively LightPath’s time-division multiplex network. This robocall mitigation plan describes the procedures implemented across the networks of all of Optimum’s subsidiaries for the mitigation of robocalls on those voice networks. In cases where one voice service provider has implemented a different or additional procedure, that is noted below.

I. AVOIDING ORIGINATING ILLEGAL ROBOCALL TRAFFIC

A. Implementation of STIR/SHAKEN

Except for local-to-local calls on the LightPath network, all other Optimum voice service provider subsidiaries have fully implemented the STIR/SHAKEN authentication framework across their entire Internet Protocol (“IP”)-based network. All SIP traffic originated on those networks is routed to and authenticated by Optimum’s network and is subject to the STIR/SHAKEN call authentication protocols. All inbound domestic voice traffic terminating on those networks is also verified by Optimum before it terminates. Where caller ID information is provided by the upstream provider, Optimum confirms attestation, and the voice service provider signals “pass,” “failure,” or “no validation results” downstream to the end-user.

Optimum subsidiary LightPath is subject to the non-IP network extension of the STIR/SHAKEN implementation deadline under section 64.6304(d) of the Commission’s rules because it does not initiate, maintain, carry, process, certain calls made on its network using the SIP protocol. In particular, as mentioned above, LightPath’s local-to-local New York network has not yet been upgraded to IP. Accordingly, calls originated by LightPath customers in New York that terminate with other LightPath customers in New York are not authenticated under the STIR/SHAKEN framework. For those calls, LightPath relies on the “Know-Your-Customer” procedures described below to mitigate potentially illegal call traffic.

² While Optimum is a voice service provider in certain counties in North Carolina, in Buncombe and Mecklenburg Counties it only does so through resale of facilities-based services provided by Momentum Telecom. Accordingly, Optimum has no STIR/SHAKEN obligation with respect to those calls originated or terminated by Momentum; those calls are not originated or terminated on Optimum’s network. Nevertheless, as Optimum states in this Robocall Mitigation Plan, it takes all other measures required of non-facilities-based voice service providers in that area, including know-your-customer measures and participation in Industry Traceback group activities.

Optimum, on behalf of LightPath, cooperates with and participates in the Industry Traceback Group, an industry standards group working to develop a non-IP caller ID authentication solution and associated standards.

B. Know-Your-Customer Measures

- Each voice service provider covered by this robocall mitigation plan takes reasonable steps to maintain direct business relationships with all of its customers. They assign all customer telephone numbers and provision those numbers to specific devices or SIP trunks. Telephone numbers may not be modified or re-assigned by end-users without the voice service provider's assistance.
- Each voice service provider, pursuant to 47 C.F.R. § 64.1200(n)(4), takes reasonable steps to vet the identity of its retail and enterprise customers.
 - For its retail customers, each voice service provider collects the customer's name, e-mail address, billing address, and may also run a credit check.
 - For commercial customers, voice service providers collect the business name, physical address, contact person(s), state and country of incorporation, tax ID, a description of the nature of the business, and may also perform a credit check.
- Optimum has established an automated reporting system through its vendors to identify international calls suspected as fraudulent. In addition to outbound international calls, its vendor applies its fraud monitoring process to all domestic calls. Optimum's operations team reviews reports of suspect fraud, investigates the activity, and advises the voice service providers to disable telephone numbers where fraudulent activity is discovered. Customers must validate the suspicious call activity to restore services.
- Each voice service provider includes provisions in its Terms of Service ("TOS") agreements with both retail and commercial customers that prohibit the use of their service and network for robocalling activities such as telemarketing, auto-dialers, predictive dialers, or other abusive calling practices.
 - Optimum's residential service TOS agreement also prohibits residential customers from using their service for any commercial activity.
- Under the TOS, Optimum monitors voice traffic for prohibited uses and suspicious traffic patterns. If a suspicious traffic pattern is identified, Optimum may investigate and have the affected voice service provider disconnect specific transmissions or uses determined to be prohibited. Each voice service provider may also terminate a subscriber's service for violations of its TOS.

C. Know-Your-Upstream Provider Measures

- Optimum maintains direct business relationships with all of its immediate peering partners. Prior to contracting with any upstream provider from whom Optimum will carry traffic (to transmit to any voice service provider), Optimum verifies that the provider is registered in the Robocall Mitigation Database (“RMD”). Entities without current registration in the RMD are disqualified from doing business with Optimum (and, by extension, any of the voice service providers). Optimum verifies all new partner RMD certifications at the time of the initial agreement.

II. IDENTIFYING AND BLOCKING ILLEGAL TRAFFIC

A. Network-Based Blocking and Reasonable Analytics

- Consistent with 47 C.F.R. § 64.1200(k)(2)-(3), (11), Optimum has contracted with Transunion, a third-party call analytics vendor, to provide call analytics and blocking at the network level for free. All voice service provider customers are automatically opted-in to analytics-based call blocking. Transunion uses analytics to assess incoming calls and then applies a score based on the identified risk of the call being fraudulent. Based on the score, calls are categorized as fraudulent or suspicious. All calls that are categorized as fraudulent are automatically blocked at the network level. Other calls, categorized as suspicious, may be labeled as “Spam” or “Robo” to customers based on their score under the analytics.
- Consistent with 47 C.F.R. § 64.1200(o), Optimum also blocks numbers on a reasonable Do-Not-Originate List maintained by Transunion.

B. Blocking On Commission Notification

- Consistent with 47 C.F.R. § 64.1200(n)(2)-(3), Optimum has systems in place to block identified illegal traffic and substantially similar traffic on behalf of the voice service providers upon notification by the Commission.

III. TRACEBACK COMMITMENT

Pursuant to its obligations under 47 C.F.R. § 64.1200(n)(1), each voice service provider is committed to responding fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group. Each voice service provider is also committed to cooperating with such entities to investigate and stop illegal robocallers that may, despite its mitigation program and best efforts, use its service to originate illegal robocalls.