

COX WIRELESS, LLC

ROBOCALL MITIGATION PROGRAM

Pursuant to 47 C.F.R. § 64.6305(a), this document describes the specific “reasonable steps” Cox Wireless, LLC (“Cox”) has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program.

Cox Wireless is a mobile virtual network operator (“MVNO”) reselling the services of an underlying mobile network provider (“MNO”) to residential consumers under the “Cox Mobile” product name.

Steps to Avoid Originating Illegal Robocall Traffic

Cox has adopted several practices to avoid the origination of illegal robocalls by its Cox Mobile retail customers.

STIR/SHAKEN Implementation. As an MVNO, Cox Wireless 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. Cox does not own or operate the network associated with the voice service, nor does Cox have access to the underlying network for monitoring, detection, or authentication activities. Due to the underlying network provider’s implementation of STIR/SHAKEN, calls originating from Cox Mobile customers are signed in accordance with 47 C.F.R. § 64.6301(a), (1) and (2), and STIR/SHAKEN-signed calls terminating to Cox Mobile customers are verified in accordance with 47 C.F.R. § 64.6301(a), (3).

Know Your Customer. Cox uses a multi-layer Know Your Customer approach to minimize the risk of accepting as customers individuals likely to engage in illegal robocalling. As an initial matter, Cox Mobile is a residential (or “retail”) product, and Cox Wireless does not sell services to international call originators. Cox conducts internal checks to determine whether a prospective customer is a known bad actor based on prior Cox experience. For Cox Mobile customers, Cox uses an integrated passive identity and fraud scoring solution during the account opening (buy-flow) process that includes checks against multiple external and internal databases to evaluate identities and assess fraud risk prior to all account openings. Prospective Cox Mobile customers must provide phone, email, address, date of birth, and other information. This information is then used to query external, nationally recognized databases to assess the validity of the customer-provided information and produce a digital risk assessment. Cox also uses a solution that consumes the applicant information and queries a list of historical bad actor accounts and high balance bad debt accounts to identify matches or commonalities of the applicant to former fraud.

Cox Mobile customers’ use of the service is governed by the Cox Mobile Acceptable Use Policy (the “AUP”) which is designed to protect our service, our subscribers, and the community as a whole from inappropriate, illegal, or otherwise objectionable activities or activities that may impair the underlying networks used to provide service or the experience of other Cox subscribers. By using the service, Cox Mobile customers agree to abide by the terms of the AUP. Prohibited Activities include but are not limited to using the service in a manner that violates any applicable local, state, federal or international law, order or regulation, infringes upon the rights of others, interferes with or diminishes the use and enjoyment of the service by others or interferes with or diminishes Cox’s ability to provide the services. Additionally, customers may not use the service to conduct, participate in, or otherwise facilitate, fraudulent or illegal schemes or to take part in any fraudulent activities including impersonating any person or entity. Violation of any term of this AUP may result in the immediate suspension or termination of your access to the Service and/or your Cox account and in some instances may result in Cox seeking civil or criminal remedies for unlawful conduct.

Know Your Upstream Providers. As noted above, Cox Wireless is an MVNO operating as a reseller of voice services and does not own or operate the network associated with the service. The underlying network provider, as the owner and operator of the network, is the entity that exchanges voice traffic with third parties and is registered in the FCC's Robocall Mitigation Database.

Do Not Originate ("DNO") and Invalid Numbers

All network-level blocking of potentially harmful traffic such as Do Not Originate and the blocking of Invalid Numbers is performed by the underlying MNO providing voice services to the Cox Wireless MVNO.

Traceback Commitment

Cox is committed to cooperating as needed with its underlying network provider in responding 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 Cox Wireless service to originate calls. Consistent with that commitment, Cox actively participates in industry traceback efforts and has served on the Industry Traceback Group Executive Committee since becoming a contributing member at the Gold Level in 2020.

COX WIRELESS, LLC – PARENT COMPANY, PRINCIPALS, AND AFFILIATES

Parent Company: Cox Wireless, LLC is a wholly owned subsidiary of CoxCom, LLC

Principals (Cox Wireless, LLC)

Mark J. Greatrex	President
R. Perley McBride	Vice President
Charles L. Odom	Vice President and Treasurer
Rebecca L. Siegel	Vice President and Assistant Treasurer
Gregory E. Spick	Assistant Treasurer
Jennifer Hightower	Secretary
Deborah M. Lucy	Assistant Secretary

Affiliates

FRN	Name
0004330296	Cox Virginia Telcom, LLC
0004330239	Cox Nevada Telcom, LLC
0004330197	Cox Arkansas Telecom, LLC
0004329991	Cox Arizona Telcom, LLC
0004330262	Cox Rhode Island Telcom, LLC
0004330015	Cox California Telcom, LLC
0004330189	Cox Kansas Telcom, LLC
0004330148	Cox Georgia Telcom, LLC
0004330221	Cox Nebraska Telcom, LLC
0004330064	Cox Connecticut Telcom, LLC
0004330213	Cox Louisiana Telcom, LLC
0013870241	Cox Ohio Telecom LLC
0004330247	Cox Oklahoma Telcom, LLC
0004330106	Cox Florida Telcom, LP
0014799217	Cox Idaho Telcom
0004330163	Cox Iowa Telcom, LLC
0001834696	Cox Communications, Inc.
0022616452	Cox Strategic Services, LLC