

DFT Communications

Robocall Mitigation Compliance with the TRACED Act

2/17/2026

This response is submitted on behalf of DFT Communications Corporation and its wholly owned subsidiaries: Dunkirk & Fredonia Telephone, an incumbent local exchange carrier serving Fredonia, NY; Cassadaga Telephone, an incumbent local exchange carrier serving Cassadaga, NY; and DFT Local Service Corporation, a competitive local exchange carrier serving rural areas in Western New York (LATA 140).

Implementation and Extension Status

Dunkirk & Fredonia Telephone, Cassadaga Telephone, and DFT Local Service Corporation (collectively referred to herein as “DFT Communications”) are eligible for the continuing extension of the STIR/SHAKEN implementation deadline as a small voice service provider pursuant to §64.6304(a)(2), with non-IP portions within its network pursuant to §64.6304(d).

DFT Communications has not implemented a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not utilize SIP technology. DFT Communications will implement a call authentication protocol on these network segments when such a protocol is fully developed and finalized under industry standards and when the necessary equipment and software become commercially available.

Status of STIR/SHAKEN Implementation

DFT Communications has implemented STIR/SHAKEN authentication and verification for voice traffic that both originates and terminates on the IP portions of the company’s network that support SIP calls.

DFT Communications subscribes to Ribbon’s Identity Hub Service, which provides access to a comprehensive STIR/SHAKEN solution. The company utilizes Ribbon’s service for both the Secure Telephone Identity – Authentication Service and the Secure Telephone Identity – Verification Service functions. DFT Communications maintains its own STIR/SHAKEN certificate, issued by Ribbon.

Robocall Mitigation Plan

DFT Communications and its subsidiaries are voice service providers, and all calls that originate from their networks are subject to the company's robocall mitigation plan.

DFT Communications utilizes call analytics to prevent the origination of robocall traffic on its network. All carriers interconnected with DFT Communications appear in the FCC's Robocall Mitigation Database, and their traffic is subject to the same mitigation standards applied to DFT's own end users.

Analytics

DFT Communications subscribes to Ribbon's Advanced Fraud and Advanced Nuisance Scoring services. For each originating call on DFT's network, Ribbon's Reputation Scoring is used to assess the likelihood that the call is illegitimate and should be blocked.

If an originating call appears to be spoofed using a telephone number listed on a Do-Not-Originate registry, or is otherwise unallocated, unused, or invalid, the call is determined to be fraudulent and Reputation Scoring will indicate that it should be blocked.

DFT Communications has access to the Identity Hub Services Dashboard, a secure visualization and reporting platform that provides insight into reputation scoring requests and outcomes for DFT Communications' traffic. The dashboard data enables DFT to identify potential originating robocall campaigns, which can then be investigated further to determine whether they are illegitimate and require blocking.

DFT Communications has also deployed Ribbon Communications' CallTrust Robocall Mitigation product to monitor suspicious calling activity, including high call volumes, excessive short-duration calls, and elevated volumes of non-completed calls. Call monitoring is continuous and automated. A daily report of suspected activity is generated for review by designated personnel.

Traceback and Enforcement Cooperation

DFT Communications actively participates in the traceback community, including coordination with the FCC, law enforcement, and the Industry Traceback Group (ITG).

DFT Communications commits to responding within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. The

company will cooperate fully with these entities in investigating and preventing illegal robocall activity originating on its network.

Additional Certifications

Neither DFT Communications nor any entity sharing common ownership, management, directors, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing related to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, nor related to a deficient Robocall Mitigation Database certification or mitigation program description.