

Gearheart Communications dba Coalfields Telephone Co.
Robocall Mitigation Compliance with TRACED Act

Date	Author/Title	Change Summary
February 5, 2026	Neil Justice, CO Manager	Compliance with DNO Requirement

This progress report and mitigation plan is submitted on behalf of Gearheart Communications dba Coalfields Telephone Company, an incumbent local exchange carrier in serving rural Kentucky (“CTC”).

I. Implementation and Extension Status

Extensions Received Under 47 C.F.R. §64.6304

CTC is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

CTC is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as CTC’s third-party representative on the ATIS Non-IP taskforce working group.

CTC will implement a call authentication protocol on its network when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

Status of STIR/SHAKEN Implementation

CTC has implemented the STIR/SHAKEN authentication framework on a portion of its network, and all calls it originates on that portion of its network are compliant with sections 64.6301(a)(1) and (2). CTC has implemented authentication and verification with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company’s network that support SIP calls.

CTC subscribes to Ribbon’s Identity Hub Service which provides the company access to a complete STIR/SHAKEN solution. CTC uses Ribbon’s service for the Secure Telephone Identity – Authentication Service and the Secure Telephone Identity – Verification Service functions. CTC has its own STIR/SHAKEN certificate which is issued by Ribbon.

II. Robocall Mitigation Plan

CTC is a voice service provider and all calls that originate on its network are subject to the company’s robocall mitigation plan. CTC uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network. All carriers to which CTC are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

Call Analytics

CTC subscribes to the Ribbon Advanced Fraud and Advanced Nuisance scoring services. For each originating call in IMC’s network, Ribbon’s Reputation Scoring is used to determine the likelihood that the call is illegitimate and should be blocked. If an originating call is being spoofed using a telephone number that appears on a Do-Not-Originate list or otherwise is an unallocated, unused, or invalid number, the call will be determined to be fraudulent and Reputation Scoring will indicate the call needs

Gearheart Communications dba Coalfields Telephone Co.

Robocall Mitigation Compliance with TRACED Act

to be blocked. CTC has access to the Identity Hub Services Dashboard, a secure, visualization and reporting tool that provides insights into the requests made, and the outcomes of, reputation scoring for CTC's traffic. The dashboard data allows CTC to easily identify potential originating robocall campaigns which can be investigated further to determine if they are illegitimate and need to be blocked.

CTC has also deployed Ribbon Communications' CallTrust Robocall Mitigation product to monitor against suspicious calling activities including high call volumes, specifically excessive short duration calling and high volumes of non-completed calls. Call monitoring is continuous and automated and a report of suspected calls is produced daily for review by designated employees.

Know Your Customer

CTC utilizes the mitigation technique of "Know Your Customer." CTC is a small long established provider that maintains a close relationship with its subscribers. Its customers are generally "mom and pop" users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

CTC has set a call path level based on its average customer size. The level – referred to as "large volume calling capability" – is subject to change.

CTC has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- A CTC representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

All new and renewing customers are subject to the company's terms of service and / or tariffs that prohibit illegal calling activities. Those few customers that are large enough to have an individual sales agent are directly reminded that their misuse of the CTC network, including specifically robocalling, will be investigated and may result in immediate service suspension.

CTC provides a subscription-based, non-commercial legal robocalling product and educates any subscribers or potential subscribers (such churches, school systems) regarding legal versus illegal robocalling activities to insure they are compliant in their use of the product.

While CTC does not serve currently upstream providers, it recognizes that effective May 28, 2024 it must refuse to carry traffic from any provider not listed in the Robocall Mitigation Database.

III. Traceback and Enforcement Cooperation

CTC will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). CTC commitments to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither CTC nor any entity which shares 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 due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.