

MATANUSKA TELEPHONE ASSOCIATION(MTA)

Robocall Mitigation Plan

General

MTA is a voice service provider eligible for the STIR/SHAKEN extension granted under 47 CFR § 64.6304(d) Non-IP Networks.

MTA is a small, rural carrier with 17,580 voice subscriber lines.

Consistent with § 64.6303 (a)(1), MTA has upgraded its core network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. MTA is connected to TDM carriers that do not support fully-implemented STIR/SHAKEN.

MTA has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on MTA's network are subject to the described robocall mitigation program.

Purpose

MTA's internal policies prohibit customers from initiating illegal robocalls. MTA developed its voice network and network services to prevent, track and mitigate unlawful robocalls.

Procedures

Customers

MTA customers (residential voice and business voice) are required to provide a physical address. In additional business customers provide the nature of the business and a tax ID or city license number. Business customers review and sign off on their address changes when contracts renew. MTA terms and conditions permit MTA to terminate services if they are used for an unlawful purpose.

Upstream Providers

100% of MTA upstream traffic comes from three communications services providers. All three providers are in the Robocall Mitigation Database as of 2/5/26. MTA knows the physical location of the offices where we connect; and has at least one in-person contact with each provider. MTA does not directly receive traffic from any foreign originating or intermediate provider. No provider is using MTA's network to carry or process a high volume of illegal traffic.

Call Analytics

MTA has subscribed to TransNexus Clear IP service to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The Transnexus software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. In particular a suspicious, high volume of calls from one originating number (or series of numbers) will be flagged for the Switch Engineer.

Investigation

The Switch Engineer will check and see if the numbers reported are associated with a number on our network. If so, the Business Support Group will contact the customer to see if they knew

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these calls were being made, and if so, why. The Switch Engineer will work with the Network Engineering Manager and the Regulatory Manager to determine whether the traffic is permissible or constitutes a violation of the use agreement.

Customer Complaints

Upon receipt of suspected unlawful robocalls numbers, the Regulatory Manager will send the list of suspected robocall numbers to the Network Engineering Manager. The Network Engineering Manager will assign the Switch Engineer. The Switch Engineer will review the traffic identified on the telephone numbers to confirm the traffic and determine if further steps are necessary.

Enforcement

If the traffic violates MTA's terms and conditions, the Business Support group will contact the customer. If the Robocall traffic does not stop, Operations will turn down the service. The Network Engineering Manager will report to the Regulatory Manager all activity found, whether the traffic was legal, and the mitigation actions taken.

Traceback Requests

MTA will respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

DNO

MTA has contracted with a third party, Award Consulting, for their DNO list. MTA translations screens for these numbers as originators and prevents calls from being made from numbers on the DNO list.

Responsibilities

Regulatory Affairs manages the processing of all FCC, law enforcement and Traceback Manager requests for traceback and ensure Service Agreements prohibit use of TN's for illegal purposes.

Engineering maintains the voice switch to prevent Robocalling and provisions the voice switch to block the origination of unallocated, invalid and unused TNs. In addition, the group monitors the vendor Clear IP service to identify potential Robocalls and complete tracebacks.

Business Sales ensures all customers are verified and have a current Service Agreement for voice service, encourages customers to use the Do Not Call Registry and enforces service agreements.

Marketing educates customers on Robocalls.

Principals, Affiliates, Subsidiaries, and Parent Companies

MTA has not been barred from filing in the RMD by any enforcement action. None of MTA's subsidiaries have been barred.

Principals

MTA is a member-owned cooperative governed by a Board of Directors elected by the membership. The Board, through their employee, MTA's CEO, manages the business and affairs of the cooperative. MTA CEO, Demian Voiles, shall perform such duties and shall exercise such authority as the Board may from time to time vest in him/her. The Board has outlined this authority through their established Governance Policies and Executive Limitations Policies.

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Subsidiaries

MTA has the following wholly-owned subsidiaries: AlasConnect LLC, MTA Communications, MTA Fiber Holdings. MTA Fiber Holdings has two wholly-owned subsidiaries: Alpenglow and Susitna Satellite LLC.

MTA does not have a parent company or any affiliates.

MTA no longer offers wireless or cable TV but does maintain FRNs for Matanuska Kenai Inc., MTA Vision, Inc., and MTA Long Distance, Inc.

MTA and subsidiary FRNs are listed in the table below.

0001568823	Matanuska Kenai Inc.
0001573427	Matanuska Telecom Association Inc.
0004339982	AlasConnect, LLC
0006186043	MTA Long Distance, Inc.
0013922174	MTA Vision, Inc.
0014820641	MTA Communications, LLC
0030678460	MTA Fiber Holdings
0035711050	Susitna Satellite LLC