

Date	On Behalf of	Change Summary
February 18, 2026	South Central Rural Telecommunications Cooperative, Inc. South Central Telecom, LLC	Clarifying language

This submission is made on behalf of South Central Rural Telecommunications Cooperative, Inc., an incumbent cooperative telephone service provider, and its wholly owned subsidiary South Central Telecom, LLC, a provider of competitive local exchange services (collectively referred to as “South Central”). The two companies share management and robocall mitigation procedures.

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

South Central has received the following types of extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC’s rules: (1) the small voice service providers extension (§64.6304(a)), and (2) the non-IP networks extension (§64.6304(d)).

South Central 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 South Central Rural Telecommunications Cooperative, Inc.’s third-party representative on the ATIS Non-IP taskforce working group.

Status of STIR/SHAKEN Implementation

South Central has implemented authentication and verification of its traffic using the Metaswitch Call Guardian QCall STIR/SHAKEN Signing service for traffic that originates and terminates on the IP portions of the company’s network that support SIP calls.

South Central will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

South Central is a voice service provider and all calls that originate on its network are subject to the company’s robocall mitigation plan. South Central uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network. All carriers to which South Central is 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:

South Central uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If South Central has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, South Central can suspend and/or terminate service to the customer.

Know Your Customers:

- New customers requesting an excessive number of call paths are screened for legitimate usage needs.
- New and existing customers with an excessive number of call paths receive robocall outreach and education materials.
- Nearly all residential and business line customers can place only one call at a time.
- All residential and business customers are only able to place calls originating from their own phone number.
- Caller ID and call records are reviewed when service is installed to verify legitimate caller ID information.

Traceback and Enforcement Cooperation

South Central will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). South Central 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.

Additional Certifications

Neither South Central 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.

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