

Robocall Mitigation Compliance with TRACED Act

Date	On Behalf of	Change Summary
February 4, 2026	Brandenburg Telephone Company Brandenburg Telecom LLC	Update for compliance with the Sixth Report and Order

This submission is made on behalf of Brandenburg Telephone Company, an incumbent telephone service provider, and Brandenburg Telecom LLC, a provider of competitive local exchange services. Brandenburg Telecom LLC and Brandenburg Telephone Company (referred to as “Brandenburg”) are each wholly owned subsidiaries of Brandenburg Communications Corp. and share management and robocall mitigation procedures.

STIR/SHAKEN Extensions Received Under 47 C.F.R. §64.6304

Brandenburg is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider 47 CFR § 64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Brandenburg 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 Brandenburg Telephone Company’s third-party representative on the ATIS Non-IP taskforce working group.

Status of STIR/SHAKEN Implementation

Brandenburg 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). Brandenburg 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.

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

Robocall Mitigation Program

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

Analytics

Brandenburg subscribes to the Advanced Nuisance Scoring Services provided by Ribbon Communications to monitor outbound voice traffic in real time to prevent the origination of illegal robocalls. For each originating call in Brandenburg’s network, Ribbon’s Reputation Scoring is used to determine the likelihood that the call is illegitimate and it is blocked. The software alerts

Robocall Mitigation Compliance with TRACED Act

of originating 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, and Brandenburg blocks the call.

Brandenburg uses Ribbon Communications Identity Hub Service for Advanced Fraud Reputation Scoring and Advanced Nuisance Reputation Scoring. We then perform advance routing of originating calls to the correct route upon a favorable score or to a treatment if the score is not favorable.

Know Your Customer

Brandenburg's customers are primarily residential and small business end users within its limited geographic footprint. Any request to establish large volume calling capability is referred to network management and will not be implemented absent an onsite field visit to confirm that the request is consistent with use of the service for legal calling purposes.

Prohibition Against Robocalling

Brandenburg's customers are primarily residential and small businesses who purchase services pursuant to a tariff or acceptable use policy which address illegal traffic and our ability to suspend service for suspected illegal traffic. Brandenburg routinely performs public outreach about efforts by Brandenburg and the industry to fight robocalling. Larger customers are directly informed and reminded about robocall restrictions either when service is ordered or during routine account management.

Traceback and Enforcement Cooperation

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