

Robocall Mitigation Policy

Robocall Mitigation Compliance with TRACED Act

Date	On behalf of	Change Summary
23-Feb-26	Germantown Telephone Company Valstar, Inc.	Clarifying language

This response is submitted on behalf of Germantown Telephone Company, an incumbent local exchange carrier, and its wholly owned subsidiary, Valstar, Inc., a provider of competitive local exchange services. Both companies serve communities in the state of New York under the “GTel” service name. The companies share operations, including their respective Robocall Mitigation Plans, and will be referred to as GTel throughout this document.

I. Implementation and Extension Status

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

GTel 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).

GTel maintains active affiliation with industry representatives (including NECA, NTCA, and several of its equipment vendors) who participate on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as GTel’s third-party representative on the ATIS Non-IP taskforce working group.:

GTel 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

Status of STIR/SHAKEN Implementation

GTel 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 and all calls it originates on that portion of its network are compliant with sections 64.6301(a)(1) and (2).

II. Robocall Mitigation Plan

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

Know Your Customer

GTel utilizes the mitigation technique of “Know Your Customer.” GTel 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

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traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

GTel screens new customers requesting service with 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 GTel representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

GTel provides a subscription-based, non-commercial legal robocalling product and we educate 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. In addition, GTel has directly contacted its few long-time business end users with large volume calling capability to review efforts to prevent illegal robocalling.

General Prohibition Against Illegal Robocalling

GTel end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the GTel service to engage in or in connection with fraudulent activities

GTel’s end users are notified that GTel may take action up to suspension or termination of service for violation of the TOS.

III. Traceback and Enforcement Cooperation

GTel will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group. The company 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 GTel nor any entity with which it shares common ownership, management, directors, or control have been the subject of a formal Commission, law enforcement, or regulatory agency action or

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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.