

San Carlos Apache Telecommunications Utility, Inc., (San Carlos or the Company) (FRN 0004266664) has implemented a Robocall Mitigation Program, required by Section 4(b)(5)(C) of the TRACED Act, and 47 C.F.R. §64.6305, as documented herein. San Carlos Apache has received extensions of the STIR/SHAKEN implementation deadline under §64.6304(d) of the FCC's rules for the non-IP portions of its network.

San Carlos' Robocall Mitigation Program includes, but is not limited to, the following:

1. San Carlos maintains a rigorous "know your customer" process, specifically designed to prevent new and renewing customers from using its network to originate illegal calls. The Company investigates new and renewing customers seeking access to high-volume origination services and, if necessary and possible, modifies service terms and conditions to mitigate the potential of any new or renewing customer originating illegal robocalls.
2. San Carlos has implemented a "know your upstream provider" process that includes exercising due diligence prior to accepting traffic from such providers. This process includes, but is not limited to, collecting information from upstream providers such as physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the upstream provider's business. If and when necessary, San Carlos will take additional steps, such as adopting contract terms and conditions that allow termination of the traffic exchange in the event the upstream provider attempts to use San Carlos' network to carry or process a high volume of illegal traffic.
3. San Carlos commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its services to originate, carry, or process illegal robocalls.

San Carlos has designated a traceback response contact(s) who are aware of the traceback requirements contained in 47 C.F.R. §64.1200(n)(1) and the obligations contained in 47 C.F.R. §64.1200(n)(2) in the event The Company receives notification of a traceback request.

- a. Upon receipt of any traceback request, The Company will take steps to promptly investigate the traffic, and if a notice is received as outlined in FCC rules, will also take steps to effectively mitigate the illegal traffic.
 - b. If the Company determines that the identified traffic is not illegal, it will provide an explanation in the report it submits to authorities as to how the Company reached this conclusion.
 - c. If the Company determines that the identified traffic came from another voice provider with direct access to the United States public switched telephone network, the report will identify that voice service provider and the notified voice service provider should take mitigation steps if possible, or
 - d. If the Company does not reach either of these conclusions (b or c above), its report will include the steps it will take to effectively mitigate this traffic.
4. San Carlos analyzes high-volume voice traffic to identify and monitor patterns consistent with robocall campaigns.
5. San Carlos utilizes TransNexus ClearIP call analytics to analyze traffic for patterns indicative of fraudulent calls – e.g., identify short duration calls with low completion rates.

6. If San Carlos detects a pattern consistent with illegal robocalls or otherwise has reason to suspect illegal robocalling or illegal spoofing is taking place over its network, San Carlos will seek to identify the party that is using its network to originate, route, or terminate these calls and take appropriate action.
 - Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating or suspending the party's ability to originate, route, or terminate calls on its network, or notifying law enforcement authorities.
7. As of February 16, 2026, San Carlos Apache Telecommunications Utility, Inc. has implemented STIR/SHAKEN in the IP portions of its network and, among other things, has been authenticating caller ID information for all SIP calls that originate on those portions of the network. However, San Carlos Apache still has portions of its network that are non-IP and cannot support STIR/SHAKEN. Therefore, for those non-IP portions of its network, San Carlos Apache must continue to avail itself of the ongoing non-IP networks extension afforded under §64.6304(d) of the FCC's rules. San Carlos Apache will implement a call authentication protocol for voice calls delivered over the non-IP portions of 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.
8. As of March 25, 2026, San Carlos Apache Telecommunications Utility, Inc has upgraded and configured switching equipment to support the Session Initiation Protocol (SIP) code 603+ as the exclusive code to notify callers when calls terminating on our Internet Protocol (IP) network are blocked based on reasonable analytics.