

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, **Custer Telephone Cooperative Inc.** submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures **Custer Telephone Cooperative Inc.** has in place to mitigate illegal robocalls as of February 13, 2026. **Custer Telephone Cooperative Inc.** may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

Custer Telephone Cooperative Inc. headquarters are located at 1101 E Main Ave. Challis ID, 83226 with a mailing address of P.O. Box 324, Challis ID, 83226 and telephone number of 208-879-2281.

Custer Telephone Cooperative Inc. is a member owned cooperative with no parent company; therefore, no individual member owner owns more than 25% of the company to qualify them as a substantial owner.

Custer Telephone Cooperative Inc. has the following principals;

- Chief Executive Officer, James D. Bennetts – jd.bennetts@custertel.com
- President, William C. Ebberts - william.ebberts@custertel.com
- Secretary, Kenneth W. Crisp - ken.crisp@custertel.com
- Chief Financial Officer, Sherry A. Maestas – sherry.maestas@custertel.com

Custer Telephone Cooperative Inc. owns a 7.29% share of **Syringa Networks LLC** and therefore, is not a substantial owner of this entity.

STIR/SHAKEN Implementation

Custer Telephone Cooperative Inc. will comply fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Custer Telephone Cooperative Inc. utilizes an end-to-end call authentication solution that fully satisfies the FCC's STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

Custer Telephone Cooperative Inc. implemented this solution in the IP portions of its network prior to September 18, 2025.

- ☐ My traffic is fully attested.
- ☒ My traffic is partially attested.
- ☐ None of my traffic is yet attested, however I have implemented the Robocall Mitigation Plan outlined below.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that CTCI has implemented to detect and prevent illegal robocalls on its network as of February 13, 2026. CTCI operates as a voice service provider, consistent with its certification in the FCC Robocall Mitigation Database. CTCI does not knowingly originate, carry, or process illegal robocalls and maintains controls designed to reduce the risk that its network is used for unlawful calling activity. CTCI will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment: **Custer Telephone Cooperative Inc.** is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and **Custer Telephone Cooperative Inc.** has not received information suggesting that robocalls are originated on its network. Therefore, **Custer Telephone Cooperative Inc.** does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence: **Custer Telephone Cooperative Inc.** conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. CTCI confirms the customer's service address for all customers.

- **Custer Telephone Cooperative Inc.** verifies customer's credit history and business reputation prior to providing service.
- **Custer Telephone Cooperative Inc.** verifies customer information when contracts are renewed or services are added.
- **Custer Telephone Cooperative Inc.** verifies the customer's identity and their right to use the telephone number presented on calls.
- **Custer Telephone Cooperative Inc.** has policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- **Custer Telephone Cooperative Inc.** uses call authentication solutions, call analytics, and reputation-based indicators to monitor traffic on its network and identify potentially unlawful call origination activity. If **Custer Telephone Cooperative Inc.** 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, **Custer Telephone Cooperative Inc.** can suspend and/or terminate service to the customer.
- **Custer Telephone Cooperative Inc.** Long distance service is partnered with Sinch and takes advantage of advanced call monitoring analytics to actively block fraudulent International and Domestic calls automatically.
- **Custer Telephone Cooperative Inc.** provides wireless services through our partnership with Strata Networks and utilizes analytics services to maintain STIR/SHAKEN compliance for wireless voice traffic.

- **Custer Telephone Cooperative Inc.** is located in a very rural area where we personally know many of our subscribers. We have very few PBX customers, so therefore an extremely small percentage of our voice customers have the ability to place more than one phone call at the same time. We have a high degree of confidence that our existing PBX customers are legitimate businesses or governmental offices. Upon the unlikely receipt of an order for new PBX service **Custer Telephone Cooperative Inc.** will consult with the new customer to ensure that the use of the PBX service will be for legitimate business purposes. Our staff will remain vigilant and will be on the lookout for any new service requests that we suspect would be used to generate illegal robocalls.

Upstream Providers

- **Custer Telephone Cooperative Inc.** is a rural telephone provider, therefore we have very few trunks connecting our network to upstream providers. We have a good relationship with those providers, and we work with them on a regular basis.
- As stated previously **Custer Telephone Cooperative Inc.** utilizes analytics to alert us to potentially harmful traffic. Sinch also utilizes active monitoring measures on their trunks to alert both of our organizations to potentially harmful traffic.
- Due to our rural location and the decreasing amount of landline telephone service, we are seeing a decline in the number of direct trunk groups we have; therefore it is unlikely that we will receive a request for a new upstream connection. In the unlikely event that we do receive a request, **Custer Telephone Cooperative Inc.** will consult with the provider to ensure that the use of the upstream connection will be for legitimate traffic and not used to generate illegal robocalls.
- If **Custer Telephone Cooperative Inc.** becomes aware that an upstream provider is carrying suspicious traffic, our staff will work with the provider, the FCC, and law enforcement to block the illegal robocall traffic as soon as possible.

Responding to Traceback Requests

- **Custer Telephone Cooperative Inc.** has designated its Operations Manager as a dedicated point of contact for addressing traceback requests. CTCI's General Manager serves as backup. CTCI commits to responding to traceback requests within 24 hours, consistent with FCC guidelines.
- **Custer Telephone Cooperative Inc.** will respond promptly to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, **Custer Telephone Cooperative Inc.** will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Cooperation with State and Federal Regulators

Custer Telephone Cooperative Inc. will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, **Custer Telephone Cooperative Inc.** will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Custer Telephone Cooperative Inc. has deployed call authentication, call labeling, and call blocking services. We have made great strides to protect our networks and consumers from harmful calls. **Custer Telephone Cooperative Inc.** is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

Custer Telephone Cooperative Inc. 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 service to originate, carry, or process illegal robocalls.

Sincerely,
James Bennetts