

GBT Communications, Inc.

**STIR/SHAKEN IMPLEMENTATION
ROBOCALL MITIGATION CERTIFICATION
ROBOCALL MITIGATION PLAN**

GBT Communications, Inc. ("GBTC" or "the Company") submits this certification pursuant to section 64.6305(d) of the Federal Communications Commission's (Commission's or FCC's) rules.

Identifying and Other Information:

GBT Communications, Inc. dba GBTC or GBT
103 Lincoln Street
Rush Center, KS 67575

All business names previously used: None

Principals, affiliates, subsidiaries, and parent companies:

GBTC is not a foreign voice service provider.

Parent: Golden Belt Telephone Association, Inc.

OCN: 767D

Individual responsible for addressing robocall mitigation-related issues:

Preston Ross, Central Office Technician,
103 Lincoln Street, Rush Center, KS 67575
785-372-4236, pross@gbtlive.com

STIR/SHAKEN Implementation

GBTC is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users. GBTC has implemented the STIR/SHAKEN authentication framework on a portion of its network, and all calls it originates on that portion are compliant with section 64.6301(a)(1) and (2) of the Commission's rules.

For the non-IP portions of its network, the Company is subject to a continuing extension as set forth in section 64.6304(d) of the Commission's rules, which is relevant to those "portions

of a voice service provider's network that rely on technology that cannot initiate, maintain, and terminate SIP calls." GBTC is a member of NTCA, which is actively participating in industry efforts to develop a non-IP solution to illegal robocalls.

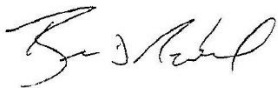
All calls that originate on Company's network are subject to the attached Robocall Mitigation Plan.

Neither GBTC nor any entity for which Company shares common ownership, management, directors, or control have ever 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 transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

GBTC has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

GBTC commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. GBTC will respond fully, within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.

I, Beau D. Rebel, General Manager of GBT Communications, Inc., certify that the Company has implemented the STIR/SHAKEN authentication framework as indicated herein and in the Robocall Mitigation Database. Pursuant to section 1.16 of the Commission's rules, I certify, under penalty of perjury that the information and statements contained herein are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "Beau D. Rebel". The signature is fluid and cursive, with the first name "Beau" and last name "Rebel" clearly distinguishable.

Beau D. Rebel
Feb. 9, 2026

Robocall Mitigation

As outlined below, GBTC has taken specific reasonable steps to avoid carrying or processing illegal robocall traffic. GBTC reserves the right to modify and/or supplement its robocall mitigation plan to adapt to risks and to improve the overall effectiveness of its program.

Company uses software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any 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. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate consistent with our Acceptable Use Policy, which prohibits utilizing GBTC services for deceptive purposes, engaging in fraudulent activities, and violating local, state, or federal laws.

Know-Your-Customer. GBTC follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group at <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>.

GBTC vets new and renewing customers. We will confirm the identity of new or renewing residential and business customers by collecting identifying information including, as applicable, SSN, date of birth, contact person for the business, physical address, state and/or country of incorporation, and federal tax ID. New customers requesting an excessive number of call paths will be screened for legitimate usage needs. New and existing customers with an excessive number of call paths will receive robocall outreach. 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.

Know-Your-Upstream Provider. GBTC knows all carriers from which it receives traffic. GBTC has confirmed that all connected providers are listed in the Robocall Mitigation Database. GBTC shares call authentication data with connected service providers.

Traceback. We will respond fully and in a timely manner 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 robocallers that use our network to originate robocalls.