



Central Cellular, L.L.C. dba COTC Connections

P.O. Box 789

223 Broadway

Davenport, OK 74834

918-377-2424

Certification

This robocall mitigation certification is for Central Cellular, L.L.C. dba COTC Connections with headquarters at 223 Broadway, Davenport, OK 74026.

We are a voice service provider with a STIR/SHAKEN obligation serving end-users. All calls that we originate are compliant with Sections 64.6301(a)(1) and (2) and 64.6301(b)(1) and (2) of the Commission's rules.

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan.

STIR/SHAKEN

We have registered with the STI-PA using OCN 1977. We have our own STIR/SHAKEN certificate issued by TransNexus STI-CA. We make all attestation-level decisions regarding the caller identification information of each SIP call we originate. We have implemented STIR/SHAKEN using an STI-AS and STI-VS supplied by TransNexus. We have implemented Out-of-Band SHAKEN for non-IP calls using an STI-AS and STI-VS supplied by TransNexus.

For the non-IP portions of our network, we are 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." We are a member of NTCA, which is actively participating in industry efforts to develop a non-IP solution to illegal robocalls.

Traceback

We are committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. We will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry

traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that uses its service to carry, process, or originate robocalls.

Identifying and Other Information

Other business names in use: Central Cellular; COTC Connections

All business names previously used: N/A

Company is not a foreign voice service provider.

Principals, Affiliates, Subsidiaries, and Parent Companies: Central Oklahoma Telephone Co., L.L.C. – parent; Steve Guest – principal; David Guest – principal

OCN: 094B

Individual responsible for addressing robocall mitigation-related issues:

Name: Steve Guest

Title: President

Department: Management

Address: P.O. Box 789, Davenport, OK 74026

Phone: 918-377-2424

Central Cellular, L.L.C. dba COTC Connections and/or any entity for which the filing entity shares common ownership, management, directors, or control have never 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. Central Cellular, L.L.C. dba COTC Connections has not been prohibited from filing in the Robocall Mitigation Database.

I, Steve Guest, President, submit this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated herein and in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC'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.



Steve Guest, President

Dated: FEB 17, 2026

Robocall Mitigation Plan

This robocall mitigation plan is for Central Cellular, L.L.C. dba COTC Connections with headquarters at 223 Broadway, Davenport, OK 74026.

We perform the following role in the call chain:

A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Know Your Upstream Provider

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

We know all providers from whom we receive traffic, and we verify that our upstream providers have filed in the robocall Mitigation database.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list. We have the ability to block suspected illegal robocalls as necessary.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.