



Doug Kosloski, K.C.
Vice-President,
Corporate Counsel
and Regulatory Affairs

2121 Saskatchewan Drive
Regina, Saskatchewan
S4P 3Y2

Telephone: (306) 777-1900
Fax: (306) 565-6216
Internet: document.control@sasktel.com

via FCC RMD

1 March 2026

Re: Saskatchewan Telecommunications (SaskTel) updated certification filing to the Federal Communications Commission Robocall Mitigation Database

1. Pursuant to Federal Communications Commission (FCC) Report and Order 24-235 released January 8, 2025, requesting the incorporation of new requirements in the filing, Saskatchewan Telecommunications (SaskTel) hereby provides the requested annual certification.
2. SaskTel notes that it is incorporating an updated status of its Network implementation of STIR/Shaken with increased capabilities within its network. However, SaskTel remains a United States Carrier with a partial STIR/Shaken implementation exemption due to its Time Division Multiplexing (TDM) interconnection with the intermediary gateway carrier.
3. I certify that I am an officer of the company and declare the following statements pertaining to SaskTel to be true.
4. SaskTel and its wholly owned subsidiaries offer a wide range of ICT products and services including competitive voice, data and Internet services, wireless data services, maxTV services, data center services, cloud-based services, security monitoring services, advertising services, and international software and consulting services. SaskTel and its wholly owned subsidiaries have a workforce of approximately 3,600 full-time equivalent employees (FTEs).
5. In context of the FCC new requirements contained in the revised requirements in Report and Order 24- 235 paragraph 8, SaskTel confirms its processes are designed to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocalls. SaskTel also confirms that it met the Traceback 24 hour requirement in 2025.
6. Furthermore, SaskTel confirms that,

- a. SaskTel is a foreign voice service non-gateway provider without an obligation to provide STIR/Shaken service¹.
 - b. SaskTel's is claiming the exemption due to its network interconnections into the United States are through an intermediary gateway and the facilities are not STIR/Shaken Compatible².
 - c. SaskTel is owned by the Government of Saskatchewan, reports to an independent Board of Directors and has received no direction prohibiting it from filing in the Robocall Mitigation Database³.
 - d. SaskTel is not the subject of any United States Commission Law enforcement or regulatory agency action or investigation with respect to Robocall mitigation.
 - e. Saskatchewan Telecommunications (SaskTel) Wireline Operating Company Number (OCN) is 8091 for SaskTel Wire line operations and is 9868 for SaskTel Wireless operations.
7. SaskTel has partially implemented the STIR/SHAKEN authentication framework on our wireless network but interfaces with the United States carriers through Time Division Multiplexing (TDM) equipment. All calls that originate on its network are subject to a robocall mitigation program. SaskTel is committed to implementing the STIR/SHAKEN authentication system and supporting processes in accordance with Canadian Radio-television and Telecommunications Commission (CRTC) timelines, expectations, and direction.
 8. What follows is a description of the detailed practices of SaskTel's robocall mitigation program that can reasonably be expected to significantly reduce the origination of illegal robocalls.
 9. SaskTel deploys several methods, techniques, and practices to mitigate the origination of illegal robocalls. Many of these are in line with the NANC Call Authentication Trust Anchor Working Group's Best Practices for Call Authentication Frameworks.⁴
 - a. Firstly, SaskTel knows our customers. SaskTel follows rigorous subscriber validation processes for both our retail and wholesale customers following standard commercial practices. Among other things, SaskTel collects the full legal name of our customers, address, date of birth, and two pieces of government issued identification and collects the same for the designated contacts for our business customers. Customers are also rigorously authenticated when they contact SaskTel to conduct business, and we always confirm with existing account contacts when other contacts are being added and / or changed on the account. All these processes help to prevent not only robocalls but help to minimize basic fraudulent behavior.

¹. See Sixth Caller ID Authentication Report and Order at 24-25, para. 44..

² Sixth Caller ID Authentication Report and Order at 25, para. 45.

³ Sixth Caller ID Authentication Report and Order at 25-26, para. 46

⁴ <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>, Executive Summary, page 4

- b. Secondly, in addition to validating the customer, on the residential side of our service, SaskTel manages the customer's right-to-use telephone number (TN) by enforcing business rules / system limitations that allow only SaskTel to change the customer's TN. A customer could request a change to their TN and / or multiple TNs, but those requests are only actioned if SaskTel makes the changes to the TN or TNs (i.e. the customer has no 'self-serve' TN change ability). On the business side of our service, although business customers can manipulate calling line information, SaskTel can trace back any calls to the source business account if needed.
- c. Thirdly, SaskTel is a member of the Canadian Secure Token – Governance Authority (CST-GA). The CST-GA has been established by a group of Canadian telecommunications carriers, in response to CRTC Compliance and Enforcement Decision 2019-403, *Establishment of the Canadian Secure Token Governance Authority*.⁵ The CST-GA will develop policies and support industry protocols and operational procedures, designed to authenticate telephone calls and mitigate spoofing and illegal robocalling, generally referred to as STIR/SHAKEN.⁶ Bell Canada, Rogers Communications, SaskTel, Shaw Communications, Telus and Vidéotron are among the founding members of the CST-GA.
- d. Fourthly, SaskTel implemented Universal Call Blocking as per Compliance and Enforcement and Telecom Regulatory Policy CRTC 2018-484, *Implementation of universal network-level blocking of calls with blatantly illegitimate caller identification*, 19 December 2018. SaskTel implemented this by the required date of 19 December 2019. Universal network-level call blocking is an effective and efficient solution to manage nuisance calls in cases where it is possible to accurately identify blatantly illegitimate caller ID spoofing.

10. All of which is respectfully submitted.

Sincerely,



Doug Kosloski, K.C.
Vice President, Corporate Counsel and Regulatory Affairs
DS/RW

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⁵ https://crtc.gc.ca/eng/archive/2019/2019-403.htm?_ga=2.258001354.1323814505.1623797063-1202762647.1520003137

⁶ About - CST-GA | Canadian Secure Token - Governance Authority (cstga.ca) FCC RMD 23 June 2021 Page 3 of 3