

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

**Cellular South Licenses, LLC
Telepak Networks, Inc. (dba C Spire)
TekLinks, Inc.
Harbor Communications, Inc.**

Cellular South Licenses, LLC, Telepak Networks, Inc. (dba C Spire), TekLinks, Inc., and Harbor Communications, LLC (C Spire or the Company) submit this certification pursuant to section 64.6305(d) of the Federal Communications Commission's (FCC's or Commission's) rules. Identifying and other information about each entity is provided in the Appendix.

STIR/SHAKEN Implementation

C Spire's role in the call chain is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-portion of its network and a voice service provider without a STIR/SHAKEN obligation on the non-IP portion of its network. The Company 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).

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." The Company is a member of NTCA, which is actively participating in industry efforts to develop a non-IP solution to illegal robocalls.

Enforcement

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

The Company has 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.

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

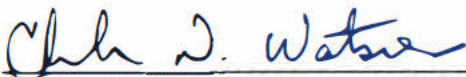
The Company commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. C Spire will respond fully, within 24 hours to all traceback requests from the Commission, law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

Traceback

C Spire 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. C Spire 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 use its

service to carry, process, or originate robocalls.

I, Charles D. Watson, Senior Vice President of Network Operations for C Spire, submit this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated 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.



Charles D. Watson
February 23, 2026

Robocall Mitigation

C Spire has taken specific reasonable steps to avoid carrying or processing illegal robocall traffic.

C Spire has retained Transaction Network Services (TNS) to implement call analytics to mitigate robocalls. TNS provides call blocking and filtering analytics from the TNS Call Guardian product to stop any callers suspected of illegal robocalling or spoofing over our network. The TNS product analyzes high-volume network traffic to identify and monitors patterns consistent with robocalls and provides real-time reports of suspicious activity.

If it is determined that a customer is originating prohibited, unlawful calls on our network, the Company will take appropriate action consistent with our Acceptable Use Policy. Violators of this policy may receive a warning to stop the unlawful activity and may have their service suspended or terminated.

We use Call Data Records to generate daily reports for short duration calls to identify potential robocallers. We have implemented fraud detection in our Least Cost Routing engine to block, in real time, multiple calls from a single user once such calls reach a threshold.

The Company's service agreements contain acceptable use and traffic integrity terms that prohibit the use of our services for illegal purposes, including the following language:

Know-Your-Customer. The Company vets new and renewing customers by asking personally identifiable questions. 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 and education materials.

Caller ID and call records are reviewed when service is installed to verify legitimate caller ID information.

Know-Your-Upstream Provider. The Company knows all carriers from which it directly receives traffic. C Spire has confirmed that all connected providers are listed in the Robocall Mitigation Database. The Company 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.

The Company 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.

Appendix

Other business names in use:

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All business names previously used: None

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