



ALASKA TELEPHONE COMPANY

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**Alaska Telephone Company
Robocall Mitigation Program
February 2026**

Certifications

Alaska Telephone Company (“ATC” or the “Company”) has implemented STIR/SHAKEN on the IP portion of the network. For the TDM portion of our network, ATC is subject to the deployment extension under 47 CFR §64.6304 of the Federal Communications Commission’s (“FCC” or “Commission”) rules: the non-IP networks extension (47 CFR §64.6304(d)).

ATC has not been the subject of a robocall investigation or action within the past two years.

ATC has not been prohibited from filing in the Robocall Mitigation Database.

Know Your Customer

ATC follows best practices to verify the identity of its end users. All ATC customers currently have physical connections to the network.

Know Your Upstream Provider

All current upstream providers of ATC are listed in the Robocall Mitigation Database, and ATC will continue to verify that new and existing providers are in the Robocall Mitigation Database.

Traceback Requests

ATC is committed to providing timely and comprehensive responses to all traceback requests from the Commission, law enforcement agencies, and the industry traceback consortium.

Traceback requests may be submitted to ATC’s support team via email at aptnoc@aptalaska.com, which is monitored during regular business hours, Monday through Friday, from 8:00 a.m. to 5:00 p.m. AKT.

For immediate assistance, support is also available 24/7/365 via our toll-free number at (866) 793-4179.

ATC will respond to all traceback requests submitted within 24 hours.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

The following provides the specific reasonable steps ATC has taken to avoid originating illegal robocall traffic:

1. *Call Analytics*: ATC has partnered with TransNexus and is using its ClearIP platform to detect and prevent originating and terminating illegal robocall traffic in the Company's exchanges listed below that have Voice over IP (VoIP)-capable switches, SS7, and reliable Internet connectivity:

- Craig
- Dry Creek
- Haines
- Hollis
- Hydaburg
- Klukwan
- Metlakatla
- Naukati
- Petersburg
- Skagway
- Tok
- Wrangell

In these exchanges, the ClearIP platform provides detailed call analysis identifying suspected illegal robocalls and blocks 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.

2. Five of ATC's exchanges – Chisana, Dot Lake, Healy Lake, Whale Pass and Meyers Chuck – have switches with TDM-only capability, lack SS7 connectivity, and/or lack reliable Internet service. In these exchanges, a single long-distance provider brings a fractional T1 to the switch for calls in and out of the community.

ATC closely monitors connectivity to these switches and vets the identities of its subscribers. Long distance rates are expensive, so any high-volume calling will be quickly noticed. There are no primary rate interfaces (PRIs) connected to private branch exchanges (PBXs). Since all calls originating from these switches are from a known entity and there is no IP voice traffic directly connected to any customer, originating illegal robocall traffic is highly unlikely.

3. One of ATC's exchanges – Edna Bay – is a very remote community with fewer than 25 customers. Edna Bay is served with a single VoIP-capable switch and a wireless broadband service. This service requires specific ATC configured equipment and is only installed by Company personnel at known customer locations. There is no access to the VoIP service any other way. A single long-distance provider brings a fractional

T1 to the switch for calls in and out of the community. Consequently, originating illegal robocall traffic from this exchange is also extremely unlikely.

4. ATC's Hyder exchange is extremely remote and is connected to the Canadian community of Stewart, British Columbia by road. In Hyder, the Canadian-based telecommunications company TELUS provides the voice switching on a contract basis. TELUS is in the process of implementing STIR/SHAKEN. There is no originating illegal robocall traffic suspected to come from this exchange.