



North Marine Corps Drive
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Teleguam Holdings, LLC, dba GTA

Robocall Mitigation Plan

Know Your Customer

Teleguam Holdings, LLC dba GTA ("GTA") maintains a risk-based Know Your Customer (KYC) program to prevent illegal robocall activity on its network. Prior to activating voice services capable of originating traffic to the PSTN, GTA verifies customer identity using commercially reasonable measures, including validation of legal entity information, authorized representatives, and intended service use. Customers are required to certify compliance with applicable federal and state laws governing robocalls and caller ID authentication.

GTA applies enhanced due diligence to higher-risk voice customers and conducts ongoing traffic monitoring for suspicious patterns, traceback notices, and other indicators of unlawful activity. GTA may suspend or terminate service, require remediation, and respond to regulatory or traceback inquiries as appropriate. GTA periodically reviews its KYC procedures to align with guidance from the **Federal Communications Commission** and industry best practices.

Traceback

We commit to responding to all traceback requests from the Commission, law enforcement, and the registered traceback consortium within twenty-four (24) hours. We will cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN Extensions

GTA is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d). Our non-IP connected carriers cannot support IP connectivity; therefore, we cannot upgrade our non-IP network to IP. All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

We block the origination of calls from unallocated, invalid, and unused TNs on our network. Furthermore, we use call analytics 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



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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.

Upstream Provider Knowledge

GTA knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using GTA's network to carry or process a high volume of illegal traffic. GTA monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic and notified that, if the traffic does not cease, the calls may be blocked from entering GTA's network. In addition, GTA's is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.