

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

(February 17, 2026 Update)

Pursuant to 47 C.F.R. § 64.6305, EssexTel, Inc. (“EssexTel”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls, as of February 17, 2026. EssexTel reserves the right to modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time as it deems appropriate to reflect its business, its capabilities, and its needs.

Company Background

EssexTel is a Massachusetts-based international wholesale telecommunications service provider for U.S.-based and foreign carriers worldwide. EssexTel is exclusively an intermediate provider; it does not originate end-user traffic. EssexTel carries traffic for other carriers, including Tier 1, retail calling card and long-distance carrier customers. All traffic is exchanged in Internet Protocol (IP). EssexTel has held a Section 214 license from the Federal Communications Commission (FCC) since 2011.

EssexTel is an intermediate voice service provider and a small provider under the FCC’s STIR/SHAKEN rules. To the extent applicable, EssexTel has implemented STIR/SHAKEN and currently authenticates calls only on behalf of its affiliated companies where call origination can be fully determined. Additionally, EssexTel will cooperatively participate with the ITG and respond to all traceback requests it receives from the FCC, law enforcement, or the Industry Traceback Group (ITG) regarding calls for which it acts as an intermediate provider. As described below, EssexTel also takes steps to ensure that its network remains free of illegal robocalls.

STIR/SHAKEN Implementation

EssexTel will comply fully with all conditions set forth in the FCC’s orders, rules, and policies regarding the implementation of the STIR/SHAKEN framework for intermediate providers, including the First Call Authentication Report and Order and Second Call Authentication Report

and Order.¹ EssexTel is an intermediate carrier subject to the requirements of 47 C.F.R. § 64.6302.

By June 30, 2021, EssexTel was fully compliant with technical procedures to pass unaltered, any identity header it receives with calls using Session Initiation Protocol (SIP) on the IP portions of its network to terminating voice service providers or subsequent intermediate providers in the call path. EssexTel was also compliant with understanding and attesting to foreign originated roaming traffic of US end users originating on its affiliated companies networks.

¹ *Call Authentication Trust Anchor; Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97 and 20-67, Report and Order and Further Notice of Proposed Rulemaking, FCC 20-42 (rel. Mar. 31, 2020); *Call Authentication Trust Anchor*, WC Docket Nos. 17-97, Second Report and Order, FCC 20-136 (rel. Oct. 1, 2020).

EssexTel has engaged a trusted third-party vendor to implement STIR/SHAKEN throughout its all-IP network by June 30, 2023 which was completed in 2022.

EssexTel now authenticates and verifies any unsigned calls it receives from its affiliated companies networks, where call origin can be verified, including foreign-originated calls with a valid US “A” number, in a manner consistent with the standards developed under the STIR/SHAKEN framework.

Robocall Mitigation Plan

In addition to becoming STIR/SHAKEN compliant, EssexTel does not accept any third-party carrier traffic that is destined to be terminated in the United States or its territories unless the originating carrier is listed in the Robo Call Mitigation database.

This is achieved through the following measures:

- **Know Your Customer.** EssexTel does not terminate any third-party traffic to the United States with the exception of the US Virgin Islands which is an affiliated company to EssexTel. This drastically reduces any potential robo calling from traversing EssexTel’s network. All traffic destined for the United States comes from EssexTel’s affiliated companies where we can trace originations directly to their source.
- **Robocall Monitoring System.** EssexTel utilizes an analytics-based monitoring system to detect robocalling originating or traversing its network. This system monitors all call attempts through the network each hour, 24 hours a day. Reports are generated for the NOC to research anytime certain triggers are hit such as excessive short duration calls.
- **Traceback Module.** EssexTel utilizes a traceback module that allows it to trace both the originating and terminating aspects of any call within 2 hours of the event, and has the capability to trace historical calls for no less than 6 months.
- **Contractual Provisions** – EssexTel’s contracts typically establish a reciprocal general obligation between EssexTel and its carrier customers to not use the services for any unlawful purpose. EssexTel contracts also include a breach clause, which stipulates the legal actions EssexTel can take in case of receiving nonconforming or illegal traffic or other unlawful activities. EssexTel contracts also reference its online-AUP which prohibits unlawful and fraudulent uses, including robo calling among other things, and enables EssexTel to easily update its terms to maintain compliance with applicable laws, regulations, and best-industry practice.

EssexTel will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should it determine that

additional measures are appropriate to mitigate the risk of illegal robocalls on its network, it may implement specific practices and procedures to stop illegal robocalls.

Responding to Traceback Requests

- Essexel follows the relevant ITG Best Practices to facilitate its response to traceback requests, including specifically:
 - **Dedicated Point of Contact** – Essexel has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual, and has provided the ITG with the contact information and business hours for those individuals.
 - **Ongoing Coordination** – Essexel will coordinate with the ITG and other voice service providers in relation to instances of suspicious traffic, including exchanging information related to such traffic and ad hoc follow-up as appropriate.
 - **Prompt Investigation and Response** – Upon receiving a traceback request from the ITG, Essexel will endeavor to initiate investigation of the source of suspicious traffic within four (4) business hours after receiving a traceback request and strive to complete the investigation and response to the request through the traceback portal within 24 hours. In the event it Essexel is unable to respond to a traceback request, it will provide sufficient information in the traceback portal as to why it is unable to respond.
 - **Privacy of Traceback Investigations** – Essexel will not share information about traceback investigations, except with the ITG, with other providers involved in the traceback investigation, or when pursuant to a valid legal process.
- Essexel maintains current and correct information about its upstream carrier customers so that it can provide accurate responses to traceback requests.
- Essexel will periodically review records of traceback requests to identify customers that are the subject of a pattern of traceback inquiries. Essexel will determine an appropriate action to take on a case-specific basis, which may include directing the customer to remedy the problem and, if effective action is not taken, temporary suspension of the customer and/or termination of the customer's service.
- Essexel maintains records of any traceback request it receives and the carrier customer involved in the request.

Cooperation with State and Federal Regulators

Essexel will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, Essexel will:

- Respond to request for information about illegal robocalls;

- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Do Not Originate

Pursuant to 28 U.S.C. § 1746, that the telephone number(s) referenced in my STIR/SHAKEN filing did not originate any of the calls associated with the unlawful, fraudulent, or otherwise unauthorized activity described in the accompanying complaint. Any call that appears to have originated from this number was made without the knowledge, consent, or authorization of the lawful subscriber and constitutes unlawful caller ID spoofing in violation of the Truth in Caller ID Act (47 U.S.C. § 227(e)) and the Federal Communications Commission's implementing rules at 47 C.F.R. § 64.1604.

Pursuant to FCC requirements governing caller ID authentication and robocall mitigation under the STIR/SHAKEN framework (47 C.F.R.

§ 64.6300 et seq.), I affirm that the legitimate subscriber or owner of the number did not place, direct, permit, authorize, or

otherwise participate in any of the calls in question. Any such call traffic is the result of misuse by an unauthorized third party and is

inconsistent with the obligations imposed on voice service providers to prevent illegal spoofing and unlawful call origination.

PRINCIPALS, AFFILIATES, SUBSIDIARIES AND PARENT

COMPANIES FOR

EssexTel, Inc.

Parent Company: ATN International, Inc.

Subsidiaries: None

Affiliates: ATN International, Inc.
Freedom 3 Investments IV, LP
Alaska Communications Systems Holdings, Inc. ACS
of Alaska, LLC
ACS of the Northland, LLC
ACS of Fairbanks, LLC
ACS of Anchorage, LLC
ACS Long Distance, LLC
Alaska Communications Internet, LLC
ACS Cable Systems, LLC
ACS Cape Newenham ES Aquisition, LLC
ACS Indian Mountain ES Acquisition, LLC
ACS of the Northland License Sub, LLC
ACS of Anchorage License Sub, LLC
ACS of Fairbanks License Sub, LLC
ACS Sparrevohm ES Acquisition, LLC
ACS Wireless License Sub, LLC
ACS Long Distance License Sub, LLC
Northstar License Corporation
Atlantic Teleconnection Operating Company Limited
Bermuda Digital Communications Ltd.
Choice Communications LLC
Commnet AZ LLC
Commnet Four Corners LLC
Commnet of Arizona LLC
Commnet of Nevada LLC
Commnet of Nevada, Subco
Commnet Rural America, LLC
Commnet Wireless, LLC
EssexTel Inc.
Excomm LLC
GTT, Inc.
Innovative Long Distance, Inc.
Logic Communications Ltd.
Mora Valley Wireless LLP
NTUA Wireless, LLC
Sacred Wind Communications, Inc.
Sal Spectrum, LLC
SW DinehNet, LLC
SW Telesolutions, Inc.
Virgin Islands Telephone Corporation
VITELCOM Cellular Inc.
WestNet Nevada LLC
WestTel Limited

Principals: All affiliate companies are owned by ATN International, Inc., a publicly traded company.

Entity Details: Name	Affiliation Details: Name	Affiliation Details: Role	Affiliation Details: Title
Bermuda Digital Communications Ltd.	Niall Sheehy	President	President
Bermuda Digital Communications Ltd.	Kimberley Caines	Secretary	Secretary
Bermuda Digital Communications Ltd.	Jeanene Patrice Stovell	Assistant Secretary	Assistant Secretary
Bermuda Digital Communications Ltd.	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Cedar Cable Ltd.	Niall Sheehy	President	President
Cedar Cable Ltd.	Kimberley Caines	Secretary	Secretary
Cedar Cable Ltd.	Jeanene Patrice Stovell	Assistant Secretary	Assistant Secretary
Cedar Cable Ltd.	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Commnet Wireless, LLC	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
Commnet Wireless, LLC	Brad W. Martin	President	President
Commnet Wireless, LLC	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Commnet Wireless, LLC	Carlos Doglioli	Treasurer	Treasurer
Commnet Wireless, LLC	James Ellison	Assistant Treasurer	Assistant Treasurer
Commnet Wireless, LLC	Neo Nicolaou	General Manager	General Manager
EssexTel, Inc.	Edward Dement	President	President
EssexTel, Inc.	Richard Bosler	Other	Vice President, Carrier Services
EssexTel, Inc.	Mary M. Mabey	Secretary	Secretary
EssexTel, Inc.	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
EssexTel, Inc.	Carlos Doglioli	Treasurer	Treasurer
Logic Communications Ltd.	Kimberley Caines	Secretary	Secretary
Logic Communications Ltd.	Patrice Stovell	Assistant Secretary	Assistant Secretary
Logic Communications Ltd.	Mary M. Mabey	Secretary	Secretary
NTUA Wireless, LLC	Mary M. Mabey	Secretary	Secretary
NTUA Wireless, LLC	Velena Tsosie	Other	General Manager
Sacred Wind Communications, Inc.	Terry Clark	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Andrew Fienberg	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Brad W. Martin	President	President
Sacred Wind Communications, Inc.	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Sacred Wind Communications, Inc.	Carlos Doglioli	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Neo Nicolaou	General Manager	General Manager
SW DinehNet, LLC	Terry Clark	Assistant Treasurer	Assistant Treasurer
SW DinehNet, LLC	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
SW DinehNet, LLC	Andrew Fienberg	Assistant Treasurer	Assistant Treasurer
SW DinehNet, LLC	Brad W. Martin	President	President
SW DinehNet, LLC	Mary M. Mabey	Assistant Secretary	Assistant Secretary
SW DinehNet, LLC	Neo Nicolaou	General Manager	General Manager
Virgin Islands Telephone Corporation	Brad W. Martin	President	President
Virgin Islands Telephone Corporation	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
Virgin Islands Telephone Corporation	Domenic C. Micale	Assistant Treasurer	Assistant Treasurer
Virgin Islands Telephone Corporation	Carlos Doglioli	Treasurer	Treasurer
Virgin Islands Telephone Corporation	Paul Kouroupas	Secretary	Secretary
Virgin Islands Telephone Corporation	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Virgin Islands Telephone Corporation	Siobhan James-Alexander	Chief Executive Officer	Chief Executive Officer
Virgin Islands Telephone Corporation	Darragh Dolan	Chief Financial Officer	Chief Financial Officer
WestTel Limited (d/b/a Logic)	Niall Sheehy	Vice-President	Vice-President
WestTel Limited (d/b/a Logic)	Mark Reynolds	Secretary	Secretary