

Alaska Communications Robocall Mitigation Plan

Pursuant to 47 C.F.R. § 64.6305, ACS of Alaska, LLC, ACS of Anchorage, LLC, ACS of Fairbanks, LLC, ACS of the Northland, LLC, ACS Long Distance, LLC, and Alaska Communications Internet, LLC (collectively “Alaska Communications” or “AC”) submit this Robocall Mitigation Plan (“RMP” or “Plan”) which describes the specific reasonable steps AC has taken to avoid, as applicable, the origination, carrying, or processing of illegal robocall traffic. The Federal Communications Commission’s (“FCC”) rules contemplate that the provider’s plan should describe how it “complies with its obligation to know its customers pursuant to § 64.1200(n)(4), any procedures in place to know its upstream providers, and the analytics system(s) it uses to identify and block illegal traffic, including whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s).” 47 C.F.R. § 64.6305(d)(1)(ii). The Commission has acknowledged, however, that “we do not specifically require providers to use call analytics.”¹ This Plan is being filed by Alaska Communications in accordance with the above-referenced requirements.

STIR/SHAKEN IMPLEMENTATION EXTENSION

Alaska Communications declares that it qualifies for an extension of the STIR/SHAKEN authentication implementation deadline pursuant to 47 CFR § 64.6304(d) for the portion of its network that is time division multiplexing (“TDM”) and thus relies on technology that cannot initiate, maintain, carry, process, and terminate Session Initiated Protocol (“SIP”) calls. Specifically, all local carrier interconnection is TDM for both competitive local exchange carriers (“CLECs”) and wireless carriers. All interexchange carrier trunks to Alaska Communications’ end office switches are likewise TDM. Alaska Communications attests that it is a member of USTelecom. USTelecom is a member of the SIP Interconnection Working Group, which is working to develop a non-IP caller identification authentication solution.

The ACS Long Distance TDM toll switch is currently being migrated to an IP capable (SIP) toll switch solution. This project includes self-signed STIR/SHAKEN implementation and is scheduled to complete in December 2026. The only portion of its network that is IP-enabled and able to implement STIR/SHAKEN is a single ACS Long Distance route to our affiliate long-distance interstate vendor EssexTel, Inc. (“EssexTel”), used for long-distance interstate calls. Alaska Communications understands that EssexTel has implemented the STIR/SHAKEN attestation rules and technical requirements for long-distance voice communications initiated by Alaska Communications’ customers.

COMPANY BACKGROUND

Alaska Communications (with its predecessors) has a 100-year history of delivering high-quality communications services to Alaska residents, businesses, government agencies, and institutions. Alaska Communications serves the Municipality of Anchorage as well as many remote rural areas throughout the state.

With the sole exception of the Municipality of Anchorage, all other Alaska Communications’ service areas are rural for purposes of the Communications Act. The majority (52 of 70) of its markets are not on the interconnected power grid and road system,² and 49 of its remote communities rely on satellite

¹ *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97, FCC 23-18, ¶ 40, n. 156 (2023).

² Rural areas of Alaska considered to be “Bush” are those that are not accessible by the state’s road system, and that also

TDM connectivity and are not Signaling System 7 (“SS7”) capable.

In its urban market, Anchorage, as well as Fairbanks, Soldotna, and Juneau, AC has introduced Voice over IP (“VoIP”) capability to complement its legacy TDM network. Although AC is constrained by lack of data connectivity between its remote communities, it is expanding VoIP services and replacement of the legacy TDM central offices with IP capable switches, where practical. All phone calls originating from these VoIP endpoints are converted to TDM prior to being handed off to other carriers.

Alaska Communications voice services are offered by these subsidiaries:

- **ACS of Alaska, LLC**, is the incumbent local exchange carrier (“ILEC”) for two study areas: (1) the City and Borough of Juneau (Juneau Study Area) and (2) Eielson Air Force Base and Fort Wainwright (Greatland Study Area).
- **ACS of Fairbanks, LLC**, also an ILEC, serves the City of Fairbanks and certain nearby areas (Fairbanks Study Area).
- **ACS of the Northland, LLC**, is the ILEC serving two study areas: (1) Sitka Borough and certain non-contiguous Bush areas, including part of Prince of Wales Island, Yakutat, Northway, Border City, and parts of the Aleutian Island chain (Sitka Bush Study Area) and (2) Kenai, Soldotna, Kodiak, and areas outside Fairbanks, including Delta Junction, Nenana, and North Pole (Glacier State Study Area).
- **ACS of Anchorage, LLC**, is the ILEC serving the Anchorage area, including Joint Base Elmendorf-Richardson and certain small communities such as Girdwood and Hope (Anchorage Study Area).
- **ACS Long Distance, LLC** (“ACS-LD”), provides long-distance telecommunications services within Alaska, and between Alaska and other states, using a combination of its own facilities and those of other facilities-based carriers.
- **Alaska Communications Internet** offers local hosted PBX Voice over Internet Protocol (VoIP) and SIP Trunk services in Anchorage and five of its larger rural markets.

ROBOCALL MITIGATION PLAN (RMP)

This Plan outlines the technology, policy, and practices implemented by Alaska Communications and subsidiary companies to avoid originating, carrying, or processing illegal robocall traffic. This document applies to all calls originating from both the TDM and IP (SIP) portions of Alaska Communications’ network delivering services on behalf of:

Legal Name	OCN / CIC	Type
Alaska Communications Internet, LLC	085J	IP-enabled Service Provider
ACS Long Distance, LLC	5353	Interexchange Carrier
ACS of Alaska, LLC	3022	Local Exchange Carrier
ACS of the Northland, LLC	3030	Local Exchange Carrier
ACS of Fairbanks, LLC	3008	Local Exchange Carrier
ACS of Anchorage, LLC	3000	Local Exchange Carrier

OBJECTIVE

Alaska Communications’ RMP outlines the various measures that it has in place to prevent the

typically lack access to a regional, interconnected power grid. Such communities are accessible only by plane, boat, barge, or snow machine, and communications facilities deployed there may require an independent power source.

origination, carrying, or processing of illegal robocalls on its voice network and assists with tracing and stopping illegal robocalls originating from other service providers. This is achieved through:

- **Knowing its subscriber customers.** AC will continue to verify its customers' business license status and sell subscriber lines only to entities physically located in its local exchange service area.
- **Preventing CLID "spoofing."** AC will screen end subscriber lines to prevent the transmission of un-owned directory numbers on subscriber lines through Calling Line ID ("CLID") screening and strict policy enforcement.
- **Rapid response to traceback requests.** AC commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium and to cooperate with such entities in investigating and stopping illegal robocallers using its service.
- **Suspending bad actors.** AC's [Acceptable Use Policy](#) allows for immediate suspension of accounts that originate illegal robocalls. Alaska Communications will investigate FCC notifications of suspected robocalls, reply to the FCC in writing, and suspend services to originators of illegal robocall traffic.
- **Validate wholesale customers.** AC will verify that all wholesale voice customers are registered in the Robocall Mitigation Database, as described below.
- **STIR/SHAKEN implementation.** Alaska Communications has registered with the Policy Administrator and is an authorized service provider in the STIR/SHAKEN ecosystem. AC will sign the calls originating on the IP portions of its network when the migration from TDM to IP enabled switches is implemented. This is in progress with the toll migration completing Dec 2026 and end office switch migration completing in 2029.]

KNOW THE END SUBSCRIBER

Alaska Communications companies sell end user business and residential voice services only to those located within the state of Alaska. AC will verify that each new subscriber account is a valid business, government, or consumer through the existing sales processes that are commercially reasonable. For both business and residential customers, AC runs an identity verification process which cross-references several information sources to positively identify the subscriber prior to service activation. Business customers must also have a valid Alaska business license. AC does not offer voice services outside of this validation process.

PREVENT CLID SPOOFING

Alaska Communications permits only the transmittal of customer assigned directory numbers ("DNs") as the CLID for calls originating on the Alaska Communications network.

For traditional POTS and VoIP subscriber lines, the CLID is assigned during the installation process and either the DN is assigned to the line or another DN on the same customer account.

For VoIP SIP and ISDN PRI subscriber trunks, the CLID may be signaled by the customers' communication system (PBX). All numbers signaled by the customer's PBX are validated against the DID numbers assigned to the trunk on which the call is received by the Alaska Communications Central Office ("CO") Equipment. If the customer signaled CLID does not match a DN assigned to the trunk, the call will be blocked or the customer's primary DN will be substituted (depending on CO equipment). If a customer wishes to transmit a DN as their CLID that is not assigned to their account, they must present proof of assignment with another carrier of the DN. In this case the CLID of the trunk will be statically assigned to

this DN for all outbound calls on that trunk group and all other signaling from the customer PBX will be ignored by CO equipment.

RAPID RESPONSE TO TRACEBACK REQUESTS

Law enforcement and USTelecom Traceback Consortium requests are handled 24x7 by the Alaska Communications Integrated Network Management Center ("INMC") to provide timely and complete responses to such requests. Alaska Communications will respond to all traceback requests received from the Industry Traceback Group, state and federal regulators, including the FCC, and law enforcement within 24 hours as required under the FCC's rules. The Alaska Communications INMC is reachable at 907 564 1642 or inmc@acsalaska.com.

SUSPEND BAD ACTORS

Both wholesale (carrier) and subscriber contract language, per the AC's Acceptable Use Policy, permit the suspension of services on discovery of the origination of illegal robocalls.

AC subscribers' use of AC's services is subject to, as applicable to, its [Terms and Conditions](#) and [Acceptable Use Policy](#). This requires subscribers to agree that AC's services shall be used only in accordance with all applicable laws and regulations. Furthermore, in accordance with AC's policies, AC's services may not be used to transmit any content or communications (commercial or otherwise) that is illegal, harmful, or objectionable.

AC will also comply with each FCC Notification of Suspected Illegal Traffic, in accordance with the time period specified therein, and Section 64.1200(n)(2) of the Commission's rules, 47 C.F.R. § 64.1200(n)(2). Such notifications should be emailed to acslegal@acsalaska.com.

VALIDATE WHOLESALE CUSTOMERS

New wholesale (service provider) voice customers will be validated against the FCC's Robocall Mitigation Database prior to service activation. Alaska Communications will only provide network termination services to wholesale customers listed in the FCC Robocall Mitigation Database.



TRACEBACK REQUEST CHECKLIST

USTELECOM TRACEBACK OR LAW ENFORCEMENT AGENCIES

- _____ 1. Disclosure request made on USTelecom Traceback Law Enforcement Agency (LEA) letterhead – attach the written request to this checklist. (received via email).
- _____ 2. Suspected illegal robocall detail shown on request.
- _____ 3. Type of information requested was identified.
- _____ 4. INMC did not release requested information until written LEA request received that complied with above requirements.
- _____ 5. Record INMCINMC time spent in complying with request:
_____ Minutes _____ Hours
- _____ 6. **Information provided to law enforcement**
_____ Subscriber information / telephone number / address per request
_____ Originating Trunk Group, Carrier and Call Trace Record (SAS Trace)
- _____ 7. Send a hard copy of the following to the Legal Technician in the ACS Legal Department (MS 65) the next business day:
- (a) the completed INMC Checklist
 - (b) the written request form
 - (c) the data released to the law enforcement agency

Signature of INMC Technician

DATE

Printed Name of INMC Technician



FCC ENFORCEMENT BUREAU – ILLEGAL ROBOCALL REPORT

INVESTIGATION CHECKLIST

- _____ 1. Disclosure request made FCC Enforcement Bureau letterhead – attach the written request to this checklist. (received via email)
- _____ 2. Suspected illegal robocall detail shown on request.
- _____ 3. Network Switch Engineering time to investigate suspected illegal robocalls.
_____ Minutes _____ Hours
- _____ 4. Investigation Results
_____ Traffic originated on subscriber lines of account # _____
Account Name _____
_____ Suspect traffic originated on wholesale customer network
Wholesale Customer _____
- _____ 5. **Information provided to Legal**
_____ Subscriber information / telephone number / address per request
_____ Originating Trunk Group, Carrier and Call Trace Record (SAS Trace)
- _____ 6. Send a hard copy of the following to the Legal Technician in the AC Legal Department (MS 65) the next business day:
(a) the completed Checklist
(b) three trace call examples

Signature and Printed Name

DATE

TRACEBACK PROCESS STEPS (24 hours maximum)

- 1) INMC receives a request for traceback from FCC, Industry Traceback Group, or a Law Enforcement Authority via email.
- 2) INMC retrieves call detail from SAS server showing originating trunk group.
- 3) INMC determines whether this is a tandem (from another carrier) or AC-end customer call.
- 4) INMC provides this information to requesting authority.
- 5) INMC completes form, attaches traces, and forwards to legal department.

FCC ENFORCEMENT BUREAU STEPS

- 1) Regulatory receives notice of violation.
- 2) Regulatory forwards details to Tier 1 to open a ticket for investigation and assigns ticket to Switch Engineering.
- 3) Switch Engineering investigates expeditiously (< 1 business day, if possible) and provides results to Legal Team (meeting).
- 4) Legal team determines whether this is illegal traffic based upon business type.
- 5) If appropriate, Legal team directs Service Delivery to write suspend orders.
- 6) Legal team responds to FCC notice.