

Robocall Mitigation Plan

February 27, 2026

GCI Communication Corp.

Other DBA Names

United Utilities, Inc. (Wireline)
United-KUC, Inc. (Wireline)
Yukon Telephone Company, Inc. (Wireline)
The Alaska Wireless Network (Wireless)

Previous Business Names

Alaska Digitel
Alaska Wireless
MACTel Unicom, Inc.
General Communication, Inc.,
General Communication Corp.,
GCI

GCI's Roles In the Call Chain: For a given call, GCI Communication Corp., on behalf of itself and its operating subsidiaries listed above, ("GCI") may act in the role of (1) a voice service provider with a STIR/SHAKEN implementation obligation serving end-users; (2) a voice service provider without a STIR/SHAKEN obligation (per the extension discussed herein); (3) a voice service provider with a STIR/SHAKEN obligation acting as a wholesale provider originating calls on behalf of another provider or providers; (4) a non-gateway intermediate provider with a STIR/SHAKEN obligation and (5) a non-gateway intermediate provider without a STIR/SHAKEN obligation (per the extension discussed herein). All voice traffic that originates, transmits, or terminates on GCI's network is subject to the robocall mitigation program described in this document.

Caller ID Authentication Implementation: GCI has implemented STIR/SHAKEN pursuant to 47 CFR §§ 64.6301 and 64.6302 on the portions of GCI's network that rely on technology that can initiate, maintain, and terminate SIP calls. GCI provides both wireline and wireless services. For the portions of GCI's network that rely on technology that cannot initiate, maintain, and terminate SIP calls ("GCI's TDM Network"), GCI is deemed subject to the "Non-IP Networks" STIR/SHAKEN implementation extension pursuant to 47 CFR § 64.6304(d).¹ GCI is in compliance with the requirements of 47 CFR § 64.6303 as to the portion of its network subject to the extension.²

¹ 47 CFR 64.6304(d) states: "Non-IP Networks. Those portions of a voice service provider, gateway provider, or non-gateway intermediate provider's network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls are deemed subject to a continuing extension." Providers subject to this extension must comply with the requirements of 47 CFR § 64.6303 for the portion of their network subject to the extension.

² As described herein, GCI is participating as a member of the ATIS Working Group, which is

Know Your Customer & Upstream Provider Procedures: GCI takes a number of measures to prevent new and renewing customers from originating illegal calls, including through “Know your Customer” and “Know your Upstream Provider” practices for new customers and the imposition of certain contractual provisions with end-users and commercial partners. GCI’s practices are informed by the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.³ GCI periodically evaluates its approaches and adjusts as needed so that that the measures remain effective. [BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED]

[END CONFIDENTIAL]. In the case of upstream providers from which GCI receives call traffic, GCI periodically confirms that such providers are listed in the FCC’s Robocall Mitigation Database.

GCI retains the contractual right to terminate customers if voice service is used for an unlawful or abusive purpose. *See* GCI Terms and Conditions for Wireless Service at Sections 1(c). (“Use of Service/Phone/Number”), 1(f) (“Fraudulent, Illegal or Abusive Activity”), and 1(n) (“Default/Termination”); and GCI Telephone Service Terms and Conditions at Section 12 (“Lawful Purposes Only”).⁴ GCI’s Terms and Conditions also require customers to consent to GCI’s use of “certain technologies or practices intended to prevent the delivery of certain calls that are suspected to be generated by robocall devices and/or that conceal their originating telephone number.” (GCI Telephone Service Terms and Conditions at Section 4(k)).

GCI also strives to include certain contractual protections with upstream providers designed to prevent the transmission of illegal robocalls. For instance, these protections may include, but are not limited to the following: [BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED]

working to develop non-Internet Protocol caller identification solutions.

³ See Best Practices for the Implementation of Call Authentication Frameworks, NANC Call Authentication Trust Anchor Working Group, available at <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>.

⁴ Terms and Conditions for Wireless Service, GCI.com, *available at* <https://www.gci.com/about/terms-conditions/mobile/wireless-service>; GCI Telephone Service Terms and Conditions, GCI.com, *available at* <https://www.gci.com/about/terms-conditions/phone/phone-terms-and-conditions>.

illegal robocallers that may attempt to use GCI's service to originate calls. For example, in preparation for this commitment, GCI notified all of the providers with whom it exchanges IP voice traffic of the contact information for such requests, and for any new IP voice traffic connections, GCI follows an information exchange process that includes traceback contact information. GCI also uses a distribution list to receive all traceback requests within its Network Operations Center (NOC), which is monitored 24 hours a day, 7 days a week, 365 days a year. Upon receipt of a Traceback request, NOC will promptly respond within the timeframes mandated by the FCC.⁵

Industry Coordination: GCI participates in the ATIS Working Group entitled "PTSC Non-IP Call Authentication Task Force (NIPCA TF)" through attendance by members of its engineering team in certain working sessions, and through trade associations, in order to engage in technical discussions about the viability of alternatives to STIR/SHAKEN Caller ID Authentication for Non-IP traffic. GCI's executives, attorneys, and engineers are also actively involved in conversations with its trade associations regarding caller ID authentication of TDM traffic.

This Robocall Mitigation Plan describes the specific measures that GCI has implemented to detect and prevent illegal robocalls on its network as of the date stated above. As discussed herein, GCI will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described, and take appropriate actions as necessary.

Additional Information: GCI has not been prohibited from filing in the Robocall Mitigation Database.

At no point in the last two years has GCI 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 GCI transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

GCI is a wholly owned subsidiary of GCI Liberty, Inc. GCI's affiliates and subsidiaries covered by this certification and associated robocall mitigation plan are: United Utilities, Inc., United-KUC, Inc., Yukon Telephone Company, Inc., and The Alaska Wireless Network. GCI's principals can be found on its executive team page: <https://www.gci.com/about/executive-team>.

⁵ See 47 C.F.R. § 64.6305(c)(2).