

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

(February 17, 2026 update)

Pursuant to 47 C.F.R. § 64.6305, NTUA Wireless, LLC (“NTUA Wireless”) 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. NTUA Wireless 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

NTUA Wireless, using the Choice Wireless brand, is a voice service provider providing mobile wireless and broadband services in the Navajo Nation territories in portions of Arizona, New Mexico and Utah. NTUA Wireless is not a significant source of U.S. robocalls.

STIR/SHAKEN Implementation

NTUA Wireless 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 originating and terminating voice service providers, including the First Call Authentication Report and Order and Second Call Authentication Report and Order.¹

NTUA Wireless is subject to the continuing extension provided in 47 C.F.R. § 64.6304(d) for non-IP networks and therefore is exempt from the requirements of § 64.6301 for the TDM portions of its network. 47 C.F.R. § 64.6304(d). NTUA Wireless complies with § 64.6303(b) through its parent entity’s membership in the Competitive Carriers Association (CCA), which is working with industry stakeholders to develop a non-internet Protocol caller identification authentication solution. 47 C.F.R. § 64.6303.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that NTUA Wireless has implemented to detect and prevent illegal robocalls on its network as of February 26, 2024. NTUA Wireless is not a significant source of illegal robocalls at this time and has tailored its robocall mitigation practices to address the areas most at risk of involving illegal robocalls. The measures described below explain how NTUA Wireless mitigates and addresses the risk it experiences. NTUA Wireless 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 changes are appropriate, its practices may differ from those described below.

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).

Customer Due Diligence

- NTUA Wireless collects identity information from new customers and sufficient information to verify customer information is current when services are renewed or added.
- NTUA Wireless will terminate or suspend service to customers with a history of non-compliance with its contractual obligations, including provisions relating to acceptable use of the service.

Measures to Prevent or Avoid Exchanging Illegal Robocalls

- NTUA Wireless offers a retail mobile wireless service offering voice, text and data services. This service, as provided by NTUA Wireless, is not capable of originating high-volumes of automated calls. Although it is possible that subscribers may modify their handsets by downloading apps capable of originating automated calls, NTUA Wireless does not assist subscribers with such activities. Therefore, NTUA Wireless' subscribers are not a significant source of robocalling activity and there is little risk that NTUA Wireless customers originate such calls. NTUA Wireless nevertheless monitors its network for unusual activity, including high-volume automated calling, in order to detect potential fraudulent or illegal activity.
- NTUA Wireless, working with affiliates, 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 internal Robocall team to research anytime certain triggers are hit such as excessive short-duration calls.
- NTUA Wireless 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.
- NTUA Wireless does not allow subscribers to spoof the telephone number used to originate calls. NTUA Wireless uses UMTS/LTE technology to provide services to its customers. UMTS/LTE customer devices have universal subscriber identity modules (USIMs) installed with a globally unique international mobile subscriber identity (IMSI) that is used to authenticate the device with the network. Both of these measures verify that the device is the device it is claimed to be and prevents the spoofing of telephone numbers.

Responding to Traceback Requests

- NTUA Wireless is committed to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

- NTUA Wireless will work with any customers that appear to be involved in a pattern of traceback requests or are the subject of a significant number of repeated requests in order to identify the source of any illegal traffic and to cease such traffic. NTUA Wireless may take additional measures as necessary to ensure compliance with U.S. laws.
- NTUA Wireless will maintain records of any traceback request it receives and the customer involved in the request.

Cooperation with State and Federal Regulators

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

NTUA Wireless, LLC

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 Acquisition, 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 Sparrevohn 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.	Patrice Stovell	Assistant Secretary	Assistant Secretary
Bermuda Digital Communications Ltd.	Mary M. Mabey	Secretary	Secretary
Cedar Cable Ltd.	Niall Sheehy	President	President
Cedar Cable Ltd.	Patrice Stovell	Assistant Secretary	Assistant Secretary
Cedar Cable Ltd.	Mary M. Mabey	Secretary	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.	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