

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, **NE Colorado Cellular, Inc., d/b/a Viaero Wireless (hereinafter “Viaero”)** submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Viaero has in place to mitigate illegal robocalls as of February 4, 2026. Viaero may modify, add, delete, or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities, and its needs, or to implement any changes in the regulations as required by the Federal Communications Commission (“FCC”).

STIR/SHAKEN Implementation

Viaero has implemented STIR/SHAKEN through use of the TNS Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution that satisfies the FCC’s STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS- 1000074-E, ATIS-1000080, ATIS-1000082). Additionally, Viaero has various IP Interconnections with Sinch, formerly known as Inteliquent, who is our upstream provider for long distance traffic via SIP, as well as connections that Sinch has with other upstream TDM providers, and its SMS Hub. By implementing TNS’s STIR/SHAKEN product, Viaero can attest that calls originating its network and traversing these interconnections adhere to the requirements outlined in 47 CFR § 64.6301(a)(1) and (2).

For all portions of Viaero’s network that are not exempt, Viaero has also implemented this solution in the IP portions of its network as of the date of this Plan and will update this plan should any changes arise. Viaero has converted 100% of its outbound traffic to SIP. 100% of inbound traffic is also converted to SIP.

- ☒ Traffic is fully attested.
- ☐ Traffic is partially attested.
- ☐ None of the traffic is yet attested, however I have implemented the Robocall Mitigation Plan outlined below.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that the Company has implemented to detect and prevent illegal robocalls on its network as of September 16, 2025. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. Viaero is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and Viaero has not received

information suggesting that robocalls are originated on its network. Therefore, Viaero does not consider its network at high risk of originating illegal robocalls, although such traffic is consistently monitored should an issue arise where illegal robocalls or traffic be on Viaero's network. In the event that Viaero has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to immediately remedy the problem and, if effective action is not promptly taken, Viaero can suspend and/or terminate service to the customer.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Know Your Provider: Viaero conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. The Company confirms the customer's service address for all customers.

- Viaero verifies customer's credit history and business reputation prior to providing service.
- Viaero verifies customer information when contracts are renewed or services are added.
- Viaero verifies the customer's identity and their right to use the telephone number presented on calls.
- Viaero has set policies that define the circumstances by which it will deny, suspend, or terminate service to a customer, in the event that they are found to use the service for unlawful means, including originating illegal calls, which are set forth in the Service Terms and Conditions found at:
<https://www.viaero.com/legal/terms-and-conditions/>.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- The TNS Call Guardian Authentication Hub is a hosted, managed service provided by Metaswitch in conjunction with our partner TNS. This combination provides two industry leading products with complementary technologies allowing for call blocking and filtering analytics from the TNS Call Guardian product, in order to provide protection for our subscribers from unwanted calls, whether they be robocalls, spam, nuisance, fraudulent calls, etc., as well as call signing and verification from the Metaswitch QCall STIR/SHAKEN product. By using these platforms, Viaero is actively blocking calls originating from invalid numbers, calls from do not originate (DNO) lists and blocking any calls matching reputation scores of a -3 or -4 via TNS's scoring criteria.
 - Viaero has in place an enforceable term of use and/or an acceptable use policy, as well as policies designed to detect and prevent fraudulent traffic on its network.
 - Viaero uses TNS Call Guardian analytics technologies and services to monitor traffic
- STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

on its network and identify potentially unlawful call origination activity. If Viaero has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, Viaero may suspend and/or terminate service to the customer.

- Viaero blocks the following types of calls by default:
 - ☒ Calls originating from invalid numbers per FCC Orders
 - ☒ Calls from DNO numbers as per FCC Order
- Viaero also blocks the following types of calls:
 - **Blocklists.** A list of phone numbers known to make spam calls as presented by the FCC.
 - **Caller ID Analysis.** Based on their calling past and patterns, all callers can be given a reputation like good, bad, or neutral. Helpful knowledge to stop both incoming and outgoing calls as desired.
 - **Caller ID Lookup.** Offers a method to gain additional public information including where the call is originating from.
 - **Call Screening.** Most networks and cell phones have this feature, which informed users who is calling and why before they answer the phone.
 - **Dynamic Traffic Analysis:** Some software platforms identify traffic patterns, analyzing information on calls and callers, to help weed out potentially robocalls.

Responding to Traceback Requests

- Viaero commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use its service to originate unlawful robocalls.
- Viaero will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use their service to carry, process or originate robocalls.
- Viaero has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the FCC and Industry Traceback Group (“ITG”) with the contact information and business hours for those individuals or will do so upon receipt of the first request from the FCC/ITG.
- If a pattern of questionable activity is detected, Viaero will require its customer to immediately remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Cooperation with State and Federal Regulators

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Viaero will cooperate with state and federal regulators to prevent any and all illegal robocalls and will respond within 24 hours. Specifically, Viaero will:

- Respond to all traceback requests from the ITG or FCC
- Respond to valid law enforcement requests;
- 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.

Viaero has deployed call authentication, call labeling, and call blocking services provided by TNS. We have made great strides to protect our networks and consumers from harmful calls. Viaero is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

Sincerely,

Michael Felicissimo
President