

**The Fishers Island Telephone Corporation**  
**Robocall Mitigation Policy Update**  
**February 24, 2026**

**Fishers Island Telephone Corporation (FITC)** (FRN:0004324570) is an incumbent local exchange carrier located at 161 Oriental Drive #604, Fishers Island, New York 06390. Fishers Island Utility Company (FIUC) is the parent company to FITC. FITC has a subsidiary of the Fishers Island Long Distance Company (FILD). Armando Pereira is the President and provides management of FIUC and the FITC companies. FIUC comprises the Fishers Island Electric (FIEC) and the Fishers Island Water (FIWC) companies as well under one umbrella.

FITC is considered a small rural voice and internet service provider, with fewer than 800 subscribers utilizing both TDM and SIP services in its network. The Operating Company Number (OCN) is 0095.

## **I. Implementation and Extension Status**

### Extensions Received Under 47 C.F.R. §64.6304

FITC is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider §64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

### Status of STIR/SHAKEN Implementation

FITC has implemented authentication and verification with STIR/SHAKEN voice traffic that is delivered as IP to its underlying interexchange partner through attestation services provided on a hosted basis by Inteliquent, a Sinch company and Neustar. The traffic that is TDM, from AT&T, remains subject to its robocall mitigation plans.

## **II. Robocall Mitigation**

FITC is a voice service provider and all calls that originate on its network are subject to the company's robocall mitigation plan. FITC uses Know Your Customer and Call Statistics monitoring to prevent the origination of robocall traffic on its network. The two carriers to which FITC are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

Call Statistics and analytics are collected and reported with our outbound carrier Inteliquent, a Sinch company. FITC monitors call statistics within the switching platform for unusual outbound calling patterns.

### General Prohibition Against Illegal Robocalling

FITC's end user services are subject to terms and conditions contained on its website under Company Policies and Forms. FITC specifically prohibits activities normally associated with robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using FITC's network;
- service to engage in or in connection with fraudulent activities

FITC customers are notified that it has the right to suspend or terminate service for violation of the company's policies.

**The Fishers Island Telephone Corporation**  
**Robocall Mitigation Policy Update**  
**February 24, 2026**

Know Your Customer

FITC utilizes the mitigation technique of “Know Your Customer”. FITC is a very small rural telephone company with less than 800 voice lines, that maintains a close relationship with its customers and the community. All customers, residential and business, must provide personal or business details to perform credit checks and address validation before becoming a customer of FITC allowing FITC to directly communicate with these customers about robocalling. All calls placed outside of the local calling area (off island) are long distance calls which require a subscription to either FILD or AT&T. FITC’s customers are provisioned with a maximum of 3 call paths per line, which is not enough to generate the high volume of call traffic associated with outbound robocalling.

FITC does not provide voice origination services to third party carriers; all voice origination products are provided directly to end users.

FITC has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is currently set to 3 maximum for most customers.

FITC has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- FITC will visit the premises of the business to verify the number of users at the location is appropriate for the volume of calling
- FITC specifically communicates with large volume customers, emphasizing that our policies include robocalling language that allows the company to investigate / suspend / or terminate service to customers engaged in robocalling and to share calling information about the customer should we receive a complaint of robocalling.

At this time, FITC does not have any business end users with large volume calling capability. If a business end user notifies FITC that they will be performing a large volume of outbound calls they will be directly contacted to review FITC’s policies and efforts to prevent FITC’s network from being used for illegal robocalling.

Monitoring and Enforcement

FITC monitors all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. The system provides detailed reporting to identify unusual heavy traffic which may be suspected illegal robocalls. FITC monitors outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

Call analytics are captured by our upstream carrier, Inteliquent as well as from our own network call statistics.

FITC immediately investigates any identified suspicious calls to determine if the caller was attempting to originate or transit unlawful robocalls. If it is determined that the traffic was likely unlawful, then the

**The Fishers Island Telephone Corporation**  
**Robocall Mitigation Policy Update**  
**February 24, 2026**

originator is warned to stop sending such traffic. If they continue to send traffic that appears to be unlawful, service will be terminated.

**III.      Traceback**

FITC will actively participate in the traceback community including the FCC, law enforcement, and The Industry Traceback Group. The company commits to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and disabling any illegal robocallers that use its voice infrastructure to originate calls.

**IV.      Additional Certifying Information**

FITC certifies that all calls that they originate on their network are subject to a robocall mitigation program, and prior certification has not been removed by Commission action and they have not been prohibited from filing in the Robocall Mitigation Database.

FITC is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.