

ROBOCALL MITIGATION PLAN

Circle Telephone & Electric, LLC

Circle Telephone & Electric, LLC (CTE), is an incumbent local exchange carrier serving the remote tribal community of Circle, Alaska. CTE is a privately owned public utility and does not have a parent company or any affiliates.

In compliance with 47 CFR § 64.6305(d), CTE certifies the following:

All calls that originate on CTE's network are subject to a robocall mitigation program consistent with paragraph (a) of this section.

CTE has not had a prior certification removed by Commission action and has not been prohibited from filing in the Robocall Mitigation Database.

CTE has not implemented the STIR/SHAKEN authentication framework on any portion of its non-IP network.

CTE is not a foreign voice service provider and is eligible for the grant of a continuing extension of STIR/SHAKEN implementation under § 64.6304:

1. Paragraph (a)(2): CTE is a small voice service provider with fewer than 100,000 voice service subscriber lines. As of December 2024, CTE had 46 voice service subscriber line customers.
2. Paragraph (d): CTE service is provisioned over a non-IP TDM network that relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

In compliance with § 64.6303(a) of this paragraph, CTE is a member of the National Exchange Carrier Association (NECA) which acts as its third-party representative. NECA is a member of the ATIS Non-IP Call Authentication Task Force that is working to develop a non-IP caller authentication solution.

Pursuant to § 64.6305(a), CTE has implemented the following best practice policies and procedures to mitigate or reduce illegal traffic that originates on its network. The following reasonable steps will be taken to avoid and mitigate illegal robocall traffic:

1. Know your customers: CTE follows the best practices for vetting caller identity as described by the NANC Call Authentication Trust Anchor Working Group's *Best Practices for the Implementation of Call Authentication Frameworks*. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>.)

CTE provides voice service to a remote tribal village in interior Alaska. CTE's serving area covers three square miles and provides service to 25 residential and

21 business voice subscriber lines. CTE's service is provisioned over a non-IP TDM network that limits each customer to one call path.

CTE continually monitors its monthly AT&T Carrier Distribution Report to determine if there has been any unusual activity in their outbound traffic.

The combination of a low customer count, the limitations associated with service over the TDM network, and the monitoring of outbound traffic minimizes the overall risk of an illegal call originating from CTE's serving area.

2. Know your upstream provider: CTE is a Feature Group C office with only one upstream provider. All incoming and outbound traffic is routed over the AT&T network and is subject to AT&T's robocall mitigation program.

CTE will cooperate with all traceback requests received from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

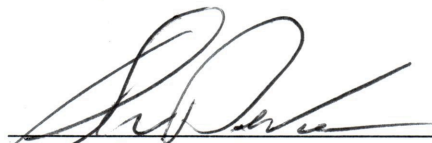
CTE is committed to responding to all traceback requests within 24 hours of the receipt of such request. CTE's contact for traceback requests is:

Shawn DeVore
Owner/President
(907) 773-5500 (Office)
(907) 378-4474 (Cell phone)
shawn@circleutilities.com

When notified by the Commission's Enforcement Bureau to mitigate any suspected illegal traffic, CTE will investigate the suspected illegal traffic, and report back to the Enforcement Bureau the mitigation steps taken and the results of said investigation. If warranted, CTE will notify the customer to stop originating unlawful calls or face termination of their service.

CTE has not been the subject of a formal Commission, law enforcement, or other regulatory agency action or investigation in the prior two years due to suspected involvement with illegal robocalling or spoofing, or due to a deficiency in its Robocall Mitigation Database certification.

I certify that the information shown above is true and correct.



Shawn DeVore, President
Circle Telephone & Electric, LLC