

Robocall Certification and Plan

Revised February 27, 2026

Pursuant to 47 C.F.R. §64.6305, AST Telecom, LLC's ("AST Telecom") submits this document on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls.

STIR/SHAKEN Implementation

AST Telecom is a voice service provider, without a STIR/SHAKEN implementation obligation serving end-users. AST Telecom currently utilizes a non-IP network which cannot support STIR/SHAKEN. Pursuant to §64.6304(d) of the FCC's rules, we are under the continuing extension of the STIR/SHAKEN implementation deadline. AST Telecom has worked actively to replace and upgrade its entire network and, upon transition to the new network, will implement STIR/SHAKEN on the IP-portion of its network. AST has completed the upgrade and has started implementation of the STIR/SHAKEN system in early 2026. This is expected to be completed by mid-2026.

ENFORCEMENT

All calls that originate on AST Telecom's network are subject to the Robocall Mitigation Program set forth below.

AST Telecom has not been prohibited from filing in the Robocall Mitigation Database by the Commission. AST Telecom and/or any entity for which the filing entity shares common ownership, management, directors, or control have never 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 transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

Traceback

AST Telecom is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. AST Telecom will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group (ITG) and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate illegal robocalls.

Identifying Information

Primary address of the provider: 478 Laufou Shop CTR, Tafuna, Pago Pago, American Samoa

96799, USA

Other business names in use: Bluesky Communications

All business names previously used: N/A

AST is a foreign voice service provider.

OCN: 1460, 071H

Principals: Tangavel Lutchmoodoo, CEO

Parent Company: Amalgamated Bluesky Telecom Holdings, LLC

Subsidiaries: American Samoa Entertainment, Inc.

Individual within company responsible for addressing robocall mitigation-related issues:

- Name: Aloiamoa Anesi
- Title: Chief Technical Officer
- Address: 478 Laufou Shop CTR, Tafuna, Pago Pago, American Samoa 96799 USA
- Phone: 684-2759 ext.
- Email: aanesi@blueskypacificgroup.com

I, Tangavel Lutchmoodoo, CEO for AST Telecom submit this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.



Tangavel Lutchmoodoo (Feb 27, 2026 12:33:19 GMT-11)

Signature

Date Feb 27, 2026

Robocall Mitigation Program

Use of Call Analytics to Identify and Block Unlawful Traffic. AST Telecom has in place policies designed to detect and prevent fraudulent traffic on its network. AST Telecom monitors call detail records to look for unusual calling patterns, including excessive minutes of use and other anomalies.

Our Terms and Condition, which must be acknowledged by all customers prior to service initiation, include a provision requiring customers to comply with all applicable laws in connection with the customer's use of our services. All customers must also agree to abide by our Acceptable Use Policy (AUP). If there is a reasonable basis to believe that a customer is originating illegal robocalls or has violated our Terms and Conditions or AUP, AST Telecom will take action, commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning, suspending or terminating the customer's service, and/or reporting the misconduct to the appropriate authorities.

Pursuant to FCC requirements, AST Telecom blocks calls originating from invalid numbers and calls from DNO numbers. All AST Telecom residential and business customers are only able to place calls originating from their own phone number. New customers requesting an excessive number of call paths are screened for legitimate usage needs.

AST Telecom is committed to maintaining a secure and lawful telecommunications environment. By combining analytics, stringent policies, and compliance with regulatory requirements, AST Telecom ensures the protection of its network, customers, and the public from fraudulent or harmful activity.

Know-our-Customer. AST Telecom vets each customer upon application for service, entering new or renewal contracts, and/or provisioning network connectivity. AST Telecom reviews caller ID and call records when service is installed to verify legitimate caller ID information. AST Telecom confirms the identity of new or renewing business customers by collecting information concerning the company name and address, physical location of the business, contact information, and the business owner's ID, where appropriate. This ensures compliance with regulatory requirements and supports accurate billing and service provision. With respect to residential customers, AST Telecom verifies customer name, address, and contact information. AST Telecom may also utilize third-party agencies to assess creditworthiness and identify potential fraud risks for both business and residential customers. These measures help safeguard the integrity of customer accounts while ensuring responsible service delivery.

Know-Your-Upstream Provider. AST Telecom knows all carriers from which it receives traffic. AST Telecom has confirmed that all connected providers are listed in the Robocall Mitigation Database. AST Telecom shares call authentication data with connected service providers.

Traceback. We will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.

