

CHOPTANK FIBER, LLC
ROBOCALL CERTIFICATION AND MITIGATION PLAN

Choptank Fiber, LLC (Choptank or Company), a voice service provider, submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the Federal Communications Commission's (Commission's or FCC's) rules.

Choptank is a voice provider without a STIR/SHAKEN obligation. Alianza, Inc. (Alianza), Choptank's underlying voice service provider has certified "complete" STIR/SHAKEN implementation. Choptank relies on procedures, policies, and safeguards implemented by Alianza to ensure that the Company's residential and business customers are sufficiently protected against robocall and spoofing activities.

Enforcement

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan. Company reserves the right to modify and/or supplement its robocall mitigation plan to adapt to risks and to improve the overall effectiveness of its program.

Choptank 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.

Choptank has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Traceback

Choptank commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. Choptank via Alianza 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 its service to carry, process, or originate robocalls.

Choptank's Identifying Information

Choptank Fiber, LLC

- Other business names in use: None
- All business names previously used: None
- Choptank is not a foreign voice service provider.

- Parent Company: Choptank Electric Cooperative, Inc.
- Principals:
 - The Board of Choptank Fiber, LLC consists of:
 - John J. Burke, Jr., Chairman
 - Robert B. Thompson, Vice Chairman
 - Donna Richardson West, Secretary
 - Amy Ireland Brandt, Treasurer
 - Douglas D. Scott
 - Robert E. Arnold
 - Matthew R. Holloway
 - Craig N. Mathies, Sr.
 - Kristen Nickerson
 - Jeffrey D. Rathell, Sr.
 - The Officers of Choptank Fiber, LLC are:
 - Micheal E. Malandro, President
 - Lisa H. DeSantis, Vice-President of Finance
 - Timothy W. McGaha, Vice-President of Operations
- Affiliates: Choptank Services Corporation
- Subsidiaries: None
- OCN: None
- Person within company responsible for addressing robocall mitigation-related issues:

Sarah Dahl, VP & General Counsel
 Legal Department
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 Denton MD 21629
 (P) 410-479-8613
 sarahd@choptankelectric.coop

I, Sarah Dahl, VP and General Counsel, for Choptank, Fiber, LLC submits 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.

Sarah M. Dahl 2/26/26 sign/date

ROBOCALL MITIGATION PROGRAM

Choptank has implemented specific reasonable steps to mitigate the risk of carrying or processing illegal robocalls on behalf of its customers.

As a reseller, Choptank relies on Alianza's call analytics to monitor call traffic. Alianza has implemented a proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud detection best practices. Alianza's platform prevents users from "spoofing" Caller ID by only allowing accounts to use telephone numbers that they own as Caller ID (which is the primary technique used by illegal robocallers). Through its fraud detection and mitigation process, Alianza will notify individual customers of potentially fraudulent activity occurring in any of that customer's subscriber accounts. Alianza may take remedial action against any subscriber's account to prevent or remediate robocalling other fraudulent activity. If Alianza takes any such action, its fraud detection system triggers notification to the customer of that action and any remedial steps that may be taken to restore service.

Alianza also monitors Choptank's outbound voice traffic to alert spikes in usage to be investigated for bad actors. The alerts identify calling patterns that would indicate robocall activity, such as an unusual number of calls from a telephone number and/or an unusual number of short duration or incomplete calls. The software also provides alerts where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. There is an immediate investigation of any identified calls to determine if the caller was attempting to originate unlawful robocalls. If it is determined that the caller was attempting to originate unlawful robocalls, then Choptank either warns the caller to stop or terminates their service, as appropriate pursuant to its Acceptable Use Policy.

Our Terms and Conditions, 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 a customer is found to have violated our Terms and Conditions or AUP, Choptank 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.

Aside from Alianza, Choptank does not utilize any other third-party analytics vendor(s).

Know-Your-Customer. Our end user customers also subscribe to our electric utility services. Our customers are members of the local community in which we operate. Therefore, we know our customers and do not consider our network at high risk of originating illegal robocalls. As part of our standard operating procedures, we conduct due diligence on new and renewing voice customers by collecting personal identifiable information. For business customers, we collect information concerning the company's name, address, physical location, contact information, and Federal Tax ID, where appropriate. With respect to residential customers, we verify customer name and address, physical service location, and contact information.

Know-Your-Upstream Provider. Choptank relies on Know-Your-Upstream Provider processes adopted by Alianza, who states that it has “existing Tier-1 carrier service providers” from which it facilitates the provision of carrier services to its service provider customers. Alianza has confirmed those carriers are listed in the Robocall Mitigation Database. Alianza has provided detailed onboarding and fraud detection guidance to require and enable its customers to comply with the obligation to prevent and mitigate illegal robocalls.

Traceback. Choptank will respond fully and in a timely manner 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 our network to originate robocalls.