

Robocall Mitigation Plan

BTC Broadband, Inc.

RMD0001866

FRN 0008669897

OCN 669B

OCC 001006818-01

Plan Year 2026

Version 2.2

January 16, 2026

1) Certifications and assertions:

BTC Broadband, Inc. ("Company"), a Voice Service Provider, certifies:

- a) All calls that originate on the Company's network are subject to a robocall mitigation program.
- b) The Company has never been subject to a Commission or other law enforcement 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 Plan (RMP) certification.

No prior certification has been removed by Federal Communications Commission action and the Company has not been prohibited from filing in the Robocall Mitigation Database (RMD).

- c) The Company has fully implemented STIR/SHAKEN on the Internet Protocol portions of its network. The Company obtained an SPC token for both OCNs (1969 and 669B) and Digital Certificates to perform its own technological act of signing calls.
- d) The Company is a Voice Service Provider that originates local and toll calls from and terminates local and toll calls to single and multiline End Users. Company plays no other roles in the call chain as an International Gateway or Intermediate provider.
- e) The Company commits to responding fully to Traceback Requests within the FCC 24-hour timeframe.

2) BTC Broadband, Inc., Operating Company Number 669B, is eligible for the continuing extension of the STIR SHAKEN implementation deadline on non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

BTC Broadband, Inc. provides local service to fewer than 100,000 voice subscriber lines. Some customers are served on the non-IP portions of BTC Broadband's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Consistent with § 64.6303 (a)(1), BTC Broadband, Inc. is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. However, BTC Broadband's non-IP network is connected to carriers that do not support IP connectivity; therefore, BTC Broadband cannot upgrade those non-IP portions of its network to IP connectivity.

- 3) Company has uploaded this revised Robocall Mitigation Plan (RMP) 2.2 for 2026 that describes the specific reasonable steps taken to avoid originating, carrying, or processing illegal robocall traffic as part of a robocall mitigation program based on our role as a voice service provider. The RMP includes:

- a) The Company is taking the following effective measures to prevent new and renewing customers from originating illegal robocalls:

The Company offers services to residential and small businesses customers. We screen customers regarding their telecom equipment and how they plan to use our services. Due to our low volume of traffic, robocalling patterns are highly visible in our detection analytics and services may be suspended immediately.

- i) All Robocalling origination by customers is prohibited in tariffs and product Terms and Conditions.
- ii) Company uses 'in-house' CDR analytic tools to detect Robocalling for both OCNs (1969 and 669B).
- iii) Any customer performing robocalling is in violation of our Terms and Conditions and may have all services suspended without notice.
- iv) Company subscribes all customers to Neustar/TransUnion Robocall Mitigation Service.

The Company has no contractual provisions with end-users or upstream providers designed to mitigate illegal robocalls at this time, with the exception of the Newstar/TransUnion Robocall Mitigation Service, which is a standard product of Newstar/TransUnion.

- b) The Company is not using a third party for analytics. The Company uses 'in-house' tools to detect robocalling for both OCNs (1969 and 669B).

The Company's Principal Voice Engineer wrote an in-house CDR investigative tool to identify any Robocalling activity. PVE uses these tools to regularly monitor for robocalling patterns. PVE also uses these tools to complete investigations. PVE forwards findings to management for action against customers. PVE also investigates any inquiries including traceback requests and robocalling inquiries.

For Customers wanting suspected robocalls blocked, BTC subscribes to Neustar/TransUnion Robocall Mitigation Service.

The Company has not yet received any traceback requests, law enforcement queries or subpoenas, or regulatory agency inquiries regarding unlawful robocalling and/or spoofing.

- c) The Company has a very small number of upstream providers, all of which are large established telecom service providers registered with FCC, including:

AT&T	Origination and termination to Local Tandem
Lumen	Origination and termination to IXC for long-distance and international calls
ANI Networks	Origination and termination to IXC for long-distance, toll free, and international calls

The Company has long-term relationships with these providers, generally a decade or longer.

4) Additional Company information:

a) Business name, address, and other identifying information:

BTC Broadband, Inc. is a corporation, registered in the state of Oklahoma.

FRN 0008669897

OCN 669B

BTC Broadband is a registered Voice Service Provider

FCC Study Area 439025

BTC Broadband, Inc. is a CLEC serving multiple Oklahoma exchanges.

Oklahoma Corporation Commission ID OCC001006818-01

b) Company's RMD contact is:

Harold Hechinger, Principal Voice Engineer

rcc@mybtc.com 918-366-0248

c) Information regarding the filing entity's principals, affiliates, subsidiaries, and parent companies, including information regarding any principal(s) that exercise management or control of the filing entity.

Bixby Telephone Company, Inc. (FRN 0001700855, OCC001004175-01) is a registered corporation in Oklahoma. Bixby Telephone Company is an ILEC (SAC 431969) and has continuously provided exchange services to the Bixby, OK exchange area for over 100 years.

BTC Broadband, Inc., (FRN 0008669897) is also a registered corporation in Oklahoma. BTC Broadband Inc. is a registered CLEC (SAC 439025), approved to provide exchange services in most of the voice local exchange areas in the state of Oklahoma. (OCC 001006818-01)

The two companies are affiliated, in that they share administrative and network resources but maintain separate billing, access lines, and voice trunking networks, based on jurisdiction.

There is no parent company. The two companies are not legally related because each has unique shareholder groups. Only one legal subsidiary exists, and it is wholly owned by BTC Broadband, Inc. The subsidiary is Bixby Real Estate Investment Trust, LLC and is engaged in non-telecom real estate property management.

The two shareholder groups have elected a single Board of Directors and delegated all management and operational duties to the following principals:

Scott Lowry, President and CEO

slowry@mybtc.com

David Braley, CFO

dbraley@mybtc.com

5) Additional information:

a) The Company is a Voice Service Provider. Company plays no other roles in the call chain as an International Gateway or Intermediate provider.

b) Company commits to responding fully to Traceback Requests within the FCC 24-hour timeframe.