



FTC Communications, LLC dba FTC Wireless Robocall Mitigation Plan

Pursuant to 47 CFR § 64.6305, FTC Communications, LLC, dba FTC Wireless, Operating Company Number 9429, hereafter “Company”, submits this report, as of February 27, 2026, on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. Company reserves the right to modify, add, delete or otherwise alter any of the policies and procedures described herein at any time as it deems appropriate to reflect its business, its capabilities, its needs, and Federal Communications Commission (“FCC”) obligations.

Company Background

Company has entered into a strategic alliance with AT&T Mobility, LLC where Company is the service provider and AT&T provides switch hosting services, including, but not limited to, compliance with Stir/Shaken. Since this agreement assigns all switching-inherent functions to AT&T, Company lacks ultimate control over the facilities and network infrastructure necessary to implement STIR/SHAKEN.

Company offers service intended for single-line use and, to its knowledge, subscriber devices are not capable of placing a high volume of calls at one time. Furthermore, Company confirms that any device it provides to its subscribers is not compatible with an automatic dialing system or software that could be used to facilitate the origination of illegal robocalls.

As a result, Company is not a significant risk of originating illegal or unwanted robocalls. Its services are not well suited to the origination of a high volume of calls. Company has tailored its Robocall Mitigation Plan in light of the low risk of illegal robocalls being originated on the network. The reasonable measures Company takes given the level of risk it faces are described in the plan.

STIR/SHAKEN Implementation

Because it does not own the infrastructure, Company has not implemented a STIR/SHAKEN call authentication framework and is unable to do so. As stated earlier in this document, Company lacks control over the network infrastructure necessary to implement STIR/SHAKEN; therefore, it is excluded from the FCC’s STIR/SHAKEN implementation obligation in accordance with paragraph 40 of the FCC’s First Call Authentication Report and Order. Instead, Company fully relies upon its underlying carrier, which owns and maintains their network infrastructure, to

implement and utilize STIR/SHAKEN authentication. Based on the foregoing, Company's role in the call chain is as a voice service provider without a STIR/SHAKEN obligation.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that Company has implemented to detect and prevent illegal robocalls as of February 27, 2026. Since the services offered are intended for single-line use, Company is not a significant source of illegal robocalls. However, the measures described below explain how Company mitigates and addresses any risks it experiences. Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should it determine that changes are appropriate, its practices may differ slightly from those described below.

Know Your Customer

Prior to service establishment with FTC, residential and business customers must provide identification to support their request for establishing service with FTC. Identification may include, but not be limited to the following:

- Full name
- Complete address
- Photo identification
- Social Security number for credit check and security deposit requirement
- Federal Tax ID number

The Company's Terms and Conditions allow the Company the right to suspend and/or terminate service to any subscriber who violates the Company's Terms and Conditions including engaging in Prohibited Voice Use. Company will suspend or terminate service to subscribers with a history of noncompliance with its terms and conditions relating to acceptable use of service. Specifically, Company's terms and conditions prohibit any illegal, unlawful, abusive, or fraudulent uses of service, including illegal robocalling. Company will suspend and/or terminate service to any subscriber who violates Company's Terms and Conditions.

Other Measures to Prevent or Avoid Exchanging Illegal Robocalls

- **Know Your Upstream Provider** –Company does not deal with any upstream providers. All calls are routed through its underlying carrier's network upon origination.
- **Robocall Analytics and Blocking** –Company relies on its underlying carrier to adopt analytics software for monitoring call traffic and to block relevant calls. Company itself does not use any call analytics systems to identify and block illegal traffic. To the best of Company's knowledge, its underlying carrier identifies and blocks calls from providers

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that have not filed in the Robocall Mitigation Database. Because such blocking is done at the network level, Company does not have control over this.

Responding to Traceback Requests

Company adheres to the following best practices to facilitate its responses to traceback requests from the FCC, law enforcement, and the Industry Traceback Group ("ITG"), including:

- **Dedicated Point of Contact** – Company has designated an email address as a point of contact for addressing traceback requests. The designated email address is ftclegal@ftc.org.
- **Ongoing Coordination** – Company will coordinate with the FCC, any recognized governmental agency, law enforcement, or the ITG in relation to instances of suspicious traffic, including exchanging information related to such traffic and ad hoc follow-up as appropriate.
- **Prompt Investigation and Response** – Upon receiving a traceback request from the FCC, any recognized governmental agency, law enforcement, or the ITG, Company will fully respond to the traceback request within 24 hours of receipt of the request. In the event Company is unable to respond to a traceback request, it will provide sufficient information as to why it is unable to respond. Company will continue to cooperate with these entities in further investigating and stopping any illegal robocallers attempting to use its service to originate illegal calls.
- **Privacy of Traceback Investigations** – Company will not share information about traceback investigations, except to an official regulatory or governing body, law enforcement or with the ITG, when involved in the traceback investigation, or when pursuant to a valid legal process.
- Company will periodically review records of traceback requests to identify subscribers that are the subject of repeated traceback inquiries. The Company will determine an appropriate action to take on a case-specific basis, which may include working with the subscriber to mitigate illegal traffic, temporary suspension of the subscriber, and/or termination of the subscriber's service.
- The Company will maintain records of any traceback requests it receives, including the relevant parties involved in the requests.

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Cooperation with Law Enforcement and State/Federal Regulators

Company certifies that it has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action. Furthermore, Company is not currently subject to a formal Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing, nor has it been so in the past two years. Finally, Company commits to cooperating with state and federal regulators to help prevent any and all illegal robocalls. Specifically, Company will:

- Respond to requests for information about illegal robocalls;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement any new robocall mitigation procedures that are mandated, or to which Company has committed, to the fullest extent possible.

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