



Robocall Data Mitigation Plan

GTT Inc.

Pursuant to 47 C.F.R. § 64.6305 GTT Inc. or GTT, submit this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls, as of February 17, 2026. GTT reserves the right to modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time as it deems appropriate to reflect its business, its capabilities, and its needs.

GTT is a voice service provider in the Cooperative Republic of Guyana providing mobile telephone service as well as wireline telephone, and internet to residential and business customers. GTT is not, and really cannot be, a significant source of U.S. robocalls. Nevertheless, GTT has implemented a Robocall Mitigation Program for its entire operation and GTT has deployed protections designed to ensure that it remains free of illegal robocalls on its network.

STIR/SHAKEN Implementation

GTT will comply fully with all conditions set forth in the FCC's orders, rules, and policies regarding the implementation of the STIR/SHAKEN framework including the First Call Authentication Report and Order and Second Call Authentication Report and Order.¹

GTT continues to exchange some of its traffic on the non-IP portions of its network as our access and interconnection arrangements are TDM-based. Under the FCC's rules, GTT is not required to implement STIR/SHAKEN for these calls at this time. However, as described below, GTT has implemented a Robocall Mitigation Plan for these and other calls it delivers over its network.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that GTT has implemented to detect and prevent illegal robocalls on its network as of February 26, 2024. GTT is not a significant source of illegal robocalls at this time and has tailored its robocall mitigation practices to address the areas most at risk of involving illegal robocalls. The measures described below explain how GTT mitigates and addresses the risk it experiences. GTT 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 from those described below.

¹ *Call Authentication Trust Anchor; Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97 and 20-67, Report and Order and Further Notice of Proposed Rulemaking, FCC 20-42 (rel. Mar. 31, 2020); *Call Authentication Trust Anchor*, WC Docket Nos. 17-97, Second Report and Order, FCC 20-42 (rel. Oct. 1, 2020).



Traceback Requests

Pursuant to 47 CFR § 64.6305(d)(4)(v), GTT has designated a point of contact to receive notice of any incidents of illegal robocall traffic. The person's name, title, address, phone number, and email address are in the RoboCall Mitigation Database portal. This individual will be the main contact responding to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. GTT is committed to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Subscriber Vetting Processes

GTT will vet the identity of residential, retail, and wholesale subscribers through normal business practices and will obtain service address information. GTT will complete an additional review of any outbound call centers or high-volume origination services within its network that may include a stricter application review process.

Telephone Validation Processes

A subscriber is permitted to use a telephone number as their caller identity, if a number is directly managed by GTT and/or obtained by GTT via an underlying partner. GTT has established a process for ensuring subscribers are utilizing only telephone numbers assigned to them or have been authorized to use.

Network Monitoring Mitigation

GTT through its affiliates analyzes and monitors network to identify and monitor patterns consistent with robocalls. GTT will take appropriate action to identify any party that is suspected of illegal robocalling or spoofing over its network. GTT works with third-party affiliates to use analytics to identify the origination or termination of illegal robocalls. GTT is utilizing a caller authentication service. GTT is utilizing an end-to-end technology solutions organization, that provides a Caller Identification Authentication (CIDA) service which includes Outbound Shield technology. This Outbound Shield uses a curated list of high-risk phone numbers and detects invalid numbers. If the calling number has been reported as spam, the calling number will be prevented from completing outbound calls.

Know-Your-Upstream Provider

GTT knows all the carriers from which it receives traffic and has confirmed that all carriers in which it exchanges traffic and from which it receives traffic are listed in the Robocall Mitigation Database. Basic identification information, such as physical business location, contact person(s),



state of incorporation, and nature of business, are collected for all of the GTT's up-stream providers. Going forward, all interconnection agreements will include prohibited traffic and traceback language.

Do Not Originate

Pursuant to 28 U.S.C. § 1746, that the telephone number(s) referenced in my STIR/SHAKEN filing did not originate any of the calls associated with the unlawful, fraudulent, or otherwise unauthorized activity described in the accompanying complaint. Any call that appears to have originated from this number was made without the knowledge, consent, or authorization of the lawful subscriber and constitutes unlawful caller ID spoofing in violation of the Truth in Caller ID Act (47 U.S.C. § 227(e)) and the Federal Communications Commission's implementing rules at 47 C.F.R. § 64.1604.

Pursuant to FCC requirements governing caller ID authentication and robocall mitigation under the STIR/SHAKEN framework (47 C.F.R. § 64.6300 et seq.), I affirm that the legitimate subscriber or owner of the number did not place, direct, permit, authorize, or otherwise participate in any of the calls in question. Any such call traffic is the result of misuse by an unauthorized third party and is inconsistent with the obligations imposed on voice service providers to prevent illegal spoofing and unlawful call origination.



ATN International, Inc.

Freedom 3 Investments IV, LP

Alaska Communications Systems Holdings, Inc. ACS of Alaska, LLC

ACS of the Northland, LLC

ACS of Fairbanks, LLC

ACS of Anchorage, LLC

ACS Long Distance, LLC

Alaska Communications Internet, LLC

ACS Cable Systems, LLC

ACS Cape Newenham ES Acquisition, LLC

ACS Indian Mountain ES Acquisition, LLC

ACS of the Northland License Sub, LLC

ACS of Anchorage License Sub, LLC

ACS of Fairbanks License Sub, LLC

ACS Sparrevohn ES Acquisition, LLC

ACS Wireless License Sub, LLC

ACS Long Distance License Sub, LLC

Northstar License Corporation

Atlantic Teleconnection Operating Company Limited Bermuda Digital Communications Ltd.

Choice Communications LLC

Commnet AZ LLC

Commnet Four Corners LLC

Commnet of Arizona LLC

Commnet of Nevada LLC

Commnet of Nevada, Subco

Commnet Rural America, LLC

Commnet Wireless, LLC

EssexTel Inc.

Excomm LLC

GTT, Inc.

Innovative Long Distance, Inc.

Logic Communications Ltd.

Mora Valley Wireless LLP

NTUA Wireless, LLC

Sacred Wind Communications, Inc.

Sal Spectrum, LLC

SW DinehN et, LLC

SW Telesolutions, Inc.

Virgin Islands Telephone Corporation

VITELCOM Cellular Inc.

WestNet Nevada LLC

WestTel Limited

Principals: All Affiliate companies are owned by ATN International, Inc., a publicly traded company.

Entity Details: Name	Affiliation Details: Name	Affiliation Details: Role	Affiliation Details: Title
Bermuda Digital Communications Ltd.	Niall Sheehy	President	President
Bermuda Digital Communications Ltd.	Kimberley Caines	Secretary	Secretary
Bermuda Digital Communications Ltd.	Jeanene Patrice Stovell	Assistant Secretary	Assistant Secretary
Bermuda Digital Communications Ltd.	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Cedar Cable Ltd.	Niall Sheehy	President	President
Cedar Cable Ltd.	Kimberley Caines	Secretary	Secretary
Cedar Cable Ltd.	Jeanene Patrice Stovell	Assistant Secretary	Assistant Secretary
Cedar Cable Ltd.	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Commnet Wireless, LLC	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
Commnet Wireless, LLC	Brad W. Martin	President	President
Commnet Wireless, LLC	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Commnet Wireless, LLC	Carlos Doglioli	Treasurer	Treasurer
Commnet Wireless, LLC	James Ellison	Assistant Treasurer	Assistant Treasurer
Commnet Wireless, LLC	Neo Nicolaou	General Manager	General Manager
EssexTel, Inc.	Edward Dement	President	President
EssexTel, Inc.	Richard Bosler	Other	Vice President, Carrier Services
EssexTel, Inc.	Mary M. Mabey	Secretary	Secretary
EssexTel, Inc.	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
EssexTel, Inc.	Carlos Doglioli	Treasurer	Treasurer
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Logic Communications Ltd.	Patrice Stovell	Assistant Secretary	Assistant Secretary
Logic Communications Ltd.	Mary M. Mabey	Secretary	Secretary
NTUA Wireless, LLC	Mary M. Mabey	Secretary	Secretary
NTUA Wireless, LLC	Velena Tsosie	Other	General Manager
Sacred Wind Communications, Inc.	Terry Clark	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Andrew Fienberg	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Brad W. Martin	President	President
Sacred Wind Communications, Inc.	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Sacred Wind Communications, Inc.	Carlos Doglioli	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Neo Nicolaou	General Manager	General Manager
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SW DinehNet, LLC	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
SW DinehNet, LLC	Andrew Fienberg	Assistant Treasurer	Assistant Treasurer
SW DinehNet, LLC	Brad W. Martin	President	President
SW DinehNet, LLC	Mary M. Mabey	Assistant Secretary	Assistant Secretary
SW DinehNet, LLC	Neo Nicolaou	General Manager	General Manager
Virgin Islands Telephone Corporation	Brad W. Martin	President	President
Virgin Islands Telephone Corporation	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
Virgin Islands Telephone Corporation	Domenic C. Micale	Assistant Treasurer	Assistant Treasurer
Virgin Islands Telephone Corporation	Carlos Doglioli	Treasurer	Treasurer
Virgin Islands Telephone Corporation	Paul Kouroupas	Secretary	Secretary
Virgin Islands Telephone Corporation	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Virgin Islands Telephone Corporation	Siobhan James-Alexander	Chief Executive Officer	Chief Executive Officer
Virgin Islands Telephone Corporation	Darragh Dolan	Chief Financial Officer	Chief Financial Officer
WestTel Limited (d/b/a Logic)	Niall Sheehy	Vice-President	Vice-President
WestTel Limited (d/b/a Logic)	Mark Reynolds	Secretary	Secretary