



Robocall Mitigation Plan
Updated: February 27, 2026

Uniti Services LLC and its voice service affiliates¹ (collectively “Uniti”) submit this updated Robocall Mitigation Plan (“Plan”) as required by 47 CFR §64.6305(d). Uniti provides voice service to its customers and serves as a gateway provider for a limited portion of its total network traffic; the vast majority of Uniti’s call traffic originates and terminates domestically. Uniti no longer provides wholesale voice services and no longer serves as an intermediate provider in that capacity. This Plan applies to Uniti’s voice services and calling platforms across both (i) the Internet Protocol (“IP”) portions of its network and (ii) non-IP portions, including TDM-based segments that do not support SIP signaling.

1. STIR/SHAKEN Implementation & Non-IP Extension

Uniti has implemented the STIR/SHAKEN authentication framework on the IP portions of its network. Calls that Uniti originates on STIR/SHAKEN-enabled portions of its network are authenticated in accordance with applicable FCC rules, including 47 C.F.R. § 64.6301(a)(1)–(2). In addition to implementing STIR/SHAKEN, Uniti employs layered mitigation measures designed to reduce the origination and carriage of illegal robocall traffic, as further described below.

For portions of Uniti’s network that are non-IP and cannot originate, maintain, carry, process, and terminate SIP calls, Uniti relies on the continuing extension framework provided under 47 C.F.R. § 64.6304(d). Consistent with FCC rules and industry efforts, Uniti continues to evaluate non-IP mitigation and authentication solutions through vendor relationships and relevant industry participation, including membership in USTelecom – the Broadband Association.

¹ Identified in Appendix B.

2. Robocall Mitigation Measures

Uniti maintains operational and contractual controls intended to prevent, identify, mitigate, and respond to suspected illegal robocall traffic. These measures include network analytics, blocking protocols, traceback participation, customer diligence, and escalation/termination practices.

2.1. Analytics and Monitoring

Using reasonable call analytics, Uniti uses an established process to identify suspicious calling patterns and to support investigation and mitigation (e.g., high volume, short duration, low completion rates). Uniti also participates in the registered industry traceback consortium and uses information learned through traceback participation to refine monitoring, analytics, and mitigation measures, as appropriate.

2.2. Blocking and Routing

Using reasonable analytics, Uniti maintains an established process for identifying and manually blocking calls originating on its network that are suspected to be spam, robocalls, or otherwise fraudulent, consistent with its role as a voice service provider and gateway provider. Uniti also participates in the registered industry traceback consortium and remains engaged at both the federal and state levels on robocall mitigation policymaking.

Uniti partners with Neustar to utilize a reputation-based solution to identify calls as likely spam for caller-ID-related services when the called party is a Uniti end user (business or consumer).

Uniti continues to monitor the development of additional call blocking and mitigation options, including options intended to provide customer controls and reduce false positives. Certain permissive call-blocking approaches are not currently technically feasible for Uniti's

network and are not available on a commercially reasonable basis in a manner that adequately mitigates the risk of large-scale inadvertent blocking of lawful calls. Nevertheless, Uniti actively monitors these developments and participates in relevant industry efforts.

Uniti is actively testing and monitoring the development of non-IP technology solutions for illegal and unwanted robocalls for potential future deployment.

3. 24 Hour Traceback Request Commitment

Uniti commits to responding fully and 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 carry or process calls.

Uniti has not been the subject of any formal FCC, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing due to illegal robocalling or spoofing in the past two years.

4. “Know Your Customer” Reviews

Uniti conducts routine reviews of all new and renewed subscribers to confirm customer identity and support lawful use of Uniti’s service. These reviews include collection and review of applicable business and contact information, which may include service address, billing address, point-of-contact details, nature of business, federal tax identification number, and other relevant information depending on customer type and services ordered.

Uniti requires completion of an application for service and may conduct credit checks in accordance with its customer contracting practices, this includes applying deposits or advanced payments when credit is not established. Where validation cannot be completed based on

information provided, Uniti may request additional information before processing an application further.

Uniti also actively monitors its network traffic for patterns indicative of suspicious calling behavior and contacts customers proactively when such patterns are detected.

4.1. Employee Training

Uniti trains its sales teams to identify “red flags” that may indicate a prospective business customer could engage in fraudulent or illegal activity. These red flags include (but are not limited to):

- The prospective customer has little or no online presence;
- The prospective customer’s name includes certain terms (e.g., Telecom, Telecommunications, Tel, VoIP, Carrier, Call, Calling, Voice, Data, Com, Caller, LD, Long Distance, Internet);
- The prospective customer’s address is not the physical address of its business location (e.g., a UPS Store, a PO Box, or an address that is atypical for a business location, such as a data center or collocation facility, without a clear business justification);
- The prospective customer references least cost routing (“LCR”) capabilities, engines, or equipment;
- The prospective customer asks whether charges vary for rural areas;
- The prospective customer specifically requests a PRI, especially more than one;
- The prospective customer indicates it carries traffic other than for its own employees;
- The prospective customer provides calling diagrams or traffic-flow diagrams to discuss third-party traffic it wants Uniti to handle;
- The prospective customer is its own RespOrg; and/or
- The prospective customer requests 4-digit precision calling.

Additionally, Uniti’s customer support team is trained to review indicators in prior bills that may suggest fraudulent or illegal activity. Specifically, these metrics include calls per second (“CPS”) relative to available concurrent calls (“CCs”) and average call duration. Uniti uses the following general guidelines:

- 1 CPS/100 CCs = Normal Traffic
- 2 CPS/100 CCs = Short Duration Traffic
- Minutes Of Use (MOU) Ratio for 1 CC = 15k Minutes
- Average call duration of 30 seconds or less

5. “Know Your Provider” Reviews

Collectively, Uniti’s operating companies have provided telecommunications services for over 100 years. Uniti’s arrangements with upstream or interconnecting providers include contractual terms intended to support lawful use of service and ongoing operational coordination.

6. Contractual Terms In Place

Uniti’s voice service customers (including commercial business and residential customers) are subject to terms and conditions that prohibit unlawful use of service and preserve Uniti’s right to deny, suspend, or terminate service for violations of contract terms and/or applicable law.

These terms generally prohibit conduct that is unlawful, harmful to or interfering with Uniti’s network (or another provider’s network), interferes with other customers’ use or enjoyment of service, constitutes abuse (including spam-related abuse where applicable), creates a security risk, or violates privacy. The terms also prohibit transmitting material that intentionally or unintentionally violates applicable laws, rules, or regulations. Uniti has the right to terminate the service and contract if the customer does engage in such conduct with little to no advanced notice, based on the nature of the behavior. As a normal course of business operations, Uniti routinely reviews its contracts and makes necessary modifications to reflect the current state of regulations.

APPENDIX A

Information about Principals, Affiliates, Subsidiaries and Parent Companies

Ownership structure:

All Operating Entities listed above are owned, directly or indirectly, by Uniti Services LLC, which in turn is indirectly owned by Uniti Group Inc. a publicly traded entity, trading under the sign UNIT.

Management structure:

Uniti is managed by a Board of Directors, which has appointed executive officers to manage day-to-day operations and act on behalf of the company. Uniti's Executive Leadership Team can be found on the company's website, www.uniti.com/about.

Current Executive Leadership Team:

- Kenny Gunderman – President & Chief Executive Officer
- Paul Bullington – Sr. Executive Vice President & Chief Financial Officer
- Daniel Heard – Sr. Executive Vice President & General Counsel
- Michael Friloux – Sr. Executive Vice President & Chief Technology Officer
- Jennifer Ragsdale – EVP & Chief Administrative Officer & Chief People Officer
- Ric Chura – Executive Vice President & Chief Information Officer
- Ronald Mudry – SVP of M&A
- Eric Daniels – SVP & President – Uniti Network
- Cathy De La Garza – SVP & President – Uniti Fiber
- John Harrobin – Sr. Executive Vice President & President – Kinetic
- Greg Ortyl – EVP & President of Strategic Accounts
- Mike Flannery – EVP & President Uniti Solutions



APPENDIX B
Operating Entities Covered by this Robocall Mitigation Plan

Company	FRN	OCN	"Other Names"	Provider Type
American Telephone Company LLC	0028311876	310H	Uniti Solutions	IP/TDM
Broadview Networks, Inc.	0003775285	5977, 9275, 2899, 9170, 9247, 1913, 4593, 1703, 9248, 5978, 1958, 7061, 7757, 2217, 1959, 1960	Uniti Solutions	IP/TDM
Business Telecom, LLC	0003744935	4265, 8689, 7797, 7796, 8688, 7795	Uniti Solutions	IP/TDM
Cavalier Telephone Mid-Atlantic, LLC	0015799133	3910, 3210	Uniti Solutions	IP/TDM
Cavalier Telephone, LLC	0003757275	4725, 7968, 7944, 4869, 8347	Uniti Solutions	IP/TDM
Choice One Communications of Connecticut, Inc.	0004328464	2706	Uniti Solutions	IP/TDM
Choice One Communications of Maine, Inc.	0008190662	9346	Uniti Solutions	IP/TDM
Choice One Communications of Massachusetts, Inc.	0004328480	4673	Uniti Solutions	IP/TDM
Choice One Communications of New York, Inc.	0004328506	4107	Uniti Solutions	IP/TDM
Choice One Communications of Ohio, Inc.	0004328530	3765	Uniti Solutions	IP/TDM
Choice One Communications of Pennsylvania, Inc.	0004328555	4024	Uniti Solutions	IP/TDM
Choice One Communications of Rhode Island, Inc.	0004328563	4957	Uniti Solutions	IP/TDM
Choice One Communications Resale, L.L.C.	0018746727		Uniti Solutions	IP/TDM
Choice One of New Hampshire, Inc.	0004328498	2527	Uniti Solutions	IP/TDM
Connecticut Broadband, LLC	0005078829		Uniti Solutions	IP/TDM
Conversent Communications of Connecticut, LLC	0008841959	3722	Uniti Solutions	IP/TDM
Conversent Communications of Maine, LLC	0008841900	3754	Uniti Solutions	IP/TDM
Conversent Communications of Massachusetts, Inc.	0008841876	4052	Uniti Solutions	IP/TDM
Conversent Communications of New Hampshire, LLC	0008842007	4053	Uniti Solutions	IP/TDM
Conversent Communications of New Jersey, LLC	0008841983	0558	Uniti Solutions	IP/TDM
Conversent Communications of New York, LLC	0008841991	3724	Uniti Solutions	IP/TDM
Conversent Communications of Rhode Island, LLC	0008841975	4054	Uniti Solutions	IP/TDM
CTC Communications Corp.	0005013669	3863, 2695, 2696, 3370, 2697, 2733, 2698, 3864, 3115, 3460, 2700, 2699, 31184, 7002	Uniti Solutions	IP/TDM

Company	FRN	OCN	"Other Names"	Provider Type
DeltaCom, LLC	0005183025	7727, 4615, 4616, 4617, 4618, 4619, 4620, 4621, 4622	Uniti Solutions	IP/TDM
Georgia Windstream, LLC	0004967741	4425	Kinetic	IP/TDM
Hunt Telecommunications, LLC	0011210416	181D	Uniti Fiber Uniti Wholesale	IP/TDM
Information Transport Solutions, Inc.	0011585528 0008146201		Uniti Fiber Uniti Wholesale	IP
Intellifiber Networks, LLC	0013102439	017G, 018G, 019G , 020G, 021G, 1040, 5293, 868F, 9333	Uniti Solutions Uniti Wholesale	IP
Kinetic ABS AR LLC	0037910825		Kinetic	IP
Kinetic ABS GA LLC	0037910833		Kinetic	IP
Kinetic ABS KY LLC	0037910916		Kinetic	IP
Kinetic ABS OH LLC	0037910940		Kinetic	IP
Kinetic ABS TX LLC	0037910957		Kinetic	IP
LDMI Telecommunications, LLC	0004371043	975, 0977, 7701	Uniti Solutions	IP/TDM
Lightship Telecom, LLC	0006194187	3038, 4286, 4286, 3037	Uniti Solutions	IP/TDM
Masscomm, LLC	0028299816		Uniti Solutions	IP/TDM
McLeodUSA Telecommunications Services, LLC	0003716073	576G, 7410, 7409, 7184, 4788, 8474, 2979, 7393, 6158, 7411, 6084, 7407, 8282, 2980, 6960, 0265, 2998, 8281, 2982, 2981, 8283, 7982, 7765, 7908, 7767	Uniti Solutions Uniti Wholesale	IP/TDM
Network Telephone, LLC	0004071262	9236, 8773, 2911, 3756, 3807, 5463, 3833, 3633	Uniti Solutions	IP/TDM
Oklahoma Windstream, LLC	0004966552	2011	Kinetic	IP/TDM
PAETEC Communications, LLC	0011017795	786F, 4534, 4151, 4733, 4989, 4874, 4227, 4717, 4716, 038F, 4206, 2680, 4152, 4153, 4029, 4084, 3083	Uniti Solutions Uniti Wholesale	IP/TDM
PAETEC iTel, LLC	0015247810	829J	Uniti Solutions	IP
Talk America, LLC	0004319430	4893, 1200, 3616,	Uniti Solutions	IP/TDM
Texas Windstream, LLC	0004967808	2153	Kinetic	IP/TDM
The Other Phone Company, LLC	0015620198	7452	Uniti Solutions	IP/TDM

Company	FRN	OCN	"Other Names"	Provider Type
Uniti Fiber GulfCo LLC	0034742437		Uniti Fiber Uniti Wholesale	IP
Uniti Services, LLC	0030023899			N/A
US LEC Communications, LLC	0003721396	615C, 0893, 3746, 8354	Uniti Solutions	IP/TDM
US LEC of Alabama, LLC	0003721396	4839	Uniti Solutions	IP/TDM
US LEC of Florida, LLC	0004987814	8692	Uniti Solutions	IP/TDM
US LEC of Georgia, LLC	0004987848	8355	Uniti Solutions	IP/TDM
US LEC of Maryland, LLC	0004987798	2589	Uniti Solutions	IP/TDM
US LEC of North Carolina, LLC	0004987707	7674	Uniti Solutions	IP/TDM
US LEC of Pennsylvania, LLC	0004987715	328B, 3079, 2514	Uniti Solutions	IP/TDM
US LEC of South Carolina, LLC	0004987780	8693	Uniti Solutions	IP/TDM
US LEC of Tennessee, LLC	0004987723	3495, 3099, 8356	Uniti Solutions	IP/TDM
US LEC of Virginia, LLC	0004987764	8357, 2515	Uniti Solutions	IP/TDM
US Xchange of Illinois, L.L.C.	0004328605	8760	Uniti Solutions	IP/TDM
US Xchange of Indiana, L.L.C.	0004328597	8366	Uniti Solutions	IP/TDM
US Xchange of Michigan, L.L.C.	0004328589	8685	Uniti Solutions	IP/TDM
US Xchange of Wisconsin, L.L.C.	0004328613	7979	Uniti Solutions	IP/TDM
Valor Telecommunications of Texas, LLC	0003783123	1164, 1193, 1165, 1181, 1163, 1180	Windstream Communications Southwest, Kinetic	IP/TDM
Windstream Accucomm Telecommunications, LLC	0001856145	0395	Kinetic	IP/TDM
Windstream Alabama, LLC	0004966594	0302	Kinetic	IP/TDM
Windstream Arkansas, LLC	0006580518	1691	Kinetic	IP/TDM
Windstream Buffalo Valley, Inc.	0008343162	0151	Kinetic	IP/TDM
Windstream Communications Kerrville, LLC	0001687813	2097	Kinetic	IP/TDM
Windstream Communications Telecom, LLC	0004941142	1997	Kinetic	IP/TDM
Windstream Communications, LLC	0014409924	7656, 856A, 7970, 2681, G118, 3572	Kinetic	IP/TDM
Windstream Concord Telephone, LLC	0003762010	0474	Kinetic	IP/TDM
Windstream Conestoga, Inc.	0005386172	0162	Kinetic	IP/TDM

Company	FRN	OCN	"Other Names"	Provider Type
Windstream D&E Systems, LLC	0003735776	4114	Kinetic	IP/TDM
Windstream D&E, Inc.	0003271871	0165	Kinetic	IP/TDM
Windstream East Texas, LLC	0004967337	2147	Windstream Sugar Land, LLC, Kinetic	IP/TDM
Windstream EN-TEL, LLC	0003738465	0999	Kinetic	IP/TDM
Windstream FiberNet, LLC	0004329363		EarthLink Carrier, LLC Uniti Solutions	IP/TDM
Windstream Florida, LLC	0004967360	0336	Kinetic	IP/TDM
Windstream Georgia Communications, LLC	0004967725	4332	Kinetic	IP/TDM
Windstream Georgia Telephone, LLC	0004967840	0364	Kinetic	IP/TDM
Windstream Georgia, LLC	0004967030	0357	Kinetic	IP/TDM
Windstream Iowa Communications, LLC	0003911385	1178, 1167, 1170, 1482	Kinetic	IP/TDM
Windstream Iowa-Comm, LLC	0005089446	8248	Kinetic	IP/TDM
Windstream IT-Comm, LLC	0013623335	938D	Kinetic	IP/TDM
Windstream KDL, LLC	0004565008	051C, 125E, 146F, 162D, 166D, 179F, 180F, 183F, 184F, 185F, 186F, 201F, 211F, 341G, 351C, 318E, 333E, 334J, 357F, 232H, 703A, 704A, 725D, 538F, 705A, 719A, 617E, 687B, 526E, 746E, 872C, 9495, 923F	Uniti Wholesale	IP
Windstream Kentucky East, LLC	0005095856	9690, 9691	Kinetic	IP/TDM
Windstream Kentucky West, LLC	0004967816	0402	Kinetic	IP/TDM
Windstream Lakedale Link, LLC	0003738424	1226	Kinetic	IP/TDM
Windstream Lakedale, Inc.	0003738416	1414	Kinetic	IP/TDM
Windstream Lexcom Communications, LLC	0001959758	0483	Kinetic	IP/TDM
Windstream Long Distance, LLC	0006814990			IP/TDM
Windstream Mississippi, LLC	0004967774	0453	Kinetic	IP/TDM

Company	FRN	OCN	"Other Names"	Provider Type
Windstream Missouri, LLC	0004965992	1885	Kinetic	IP/TDM
Windstream Montezuma, LLC	0003708575	1248	Kinetic	IP/TDM
Windstream Nebraska, Inc.	0004966099	1568	Kinetic	IP/TDM
Windstream New Edge, LLC	0003720471		EarthLink Business, LLC Uniti Solutions Uniti Wholesale	IP/TDM
Windstream New York, Inc.	0004967055	0106, 0109, 0113	Kinetic	IP/TDM
Windstream Norlight, LLC	0007345754	2466, 5514, 553B	Uniti Solutions	IP/TDM
Windstream North Carolina, LLC	0004967634	0476	Kinetic	IP/TDM
Windstream NorthStar, LLC	0018879585	4263	Kinetic	IP/TDM
Windstream NTI, LLC	0002704682	057C, 058C, 061C, 062C, 063C, 136H, 695C, 5784, 5786, 5787	Uniti Solutions	IP/TDM
Windstream NuVox Arkansas, LLC	0004944187	2790	Uniti Solutions	IP/TDM
Windstream NuVox Illinois, LLC	0004944302	3377	Uniti Solutions	IP/TDM
Windstream NuVox Indiana, LLC	0004946091	3292	Uniti Solutions	IP/TDM
Windstream NuVox Kansas, LLC	0004944229	4780	Uniti Solutions	IP/TDM
Windstream NuVox Missouri, LLC	0004944245	4891	Uniti Solutions	IP/TDM
Windstream NuVox Ohio, LLC	0004945457	3376	Uniti Solutions	IP/TDM
Windstream NuVox Oklahoma, LLC	0004944260	2813	Uniti Solutions	IP/TDM
Windstream NuVox, LLC	0004319414	4085, 7598, 8660, 0208, 2621, 2620, 2506, 4890, 205B, 206A	Uniti Solutions	IP/TDM
Windstream of the Midwest, LLC	0004986147		Kinetic	IP/TDM
Windstream Ohio, LLC	0006236608	0665	Kinetic	IP/TDM
Windstream Oklahoma, LLC	0004967790	1965	Kinetic	IP/TDM
Windstream Pennsylvania, LLC	0004967683	0176	Kinetic	IP/TDM
Windstream South Carolina, LLC	0004967014	0517	Kinetic	IP/TDM
Windstream Standard, LLC	0004207239	0386	Kinetic	IP/TDM
Windstream Western Reserve, LLC	0004967691	0666	Kinetic	IP/TDM