

**Winn Telecom
Robocall Mitigation Plan
V.5 June 2026**

STIR/SHAKEN IMPLEMENTATION

Winn Telecom (the “Company”) is a small/rural carrier that is fully compliant with STIR SHAKEN and eligible for the extension granted to voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304. Winn Telecom is owned by Peninsula Fiber Network (PFN, LLC), which is jointly owned by two principal parent companies, Baraga Telephone Company and Hiawatha Communications, Inc., each holding a 50% stake. PFN currently operates alongside affiliated subsidiaries, including Alpha Connect, LLC, Huron Mountain Communications Co., and Peninsula Fiber Network Next Generation Services, LLC. The Company has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network. All calls that originate on The Company's network are subject to the described robocall mitigation program.

Parent Companies & Principals – Baraga Telephone Company, Paul Stark; Hiawatha Telephone Company, Bill Tidd; Peninsula Fiber Network, LLC, Cory Heigl

Affiliates & Subsidiaries – Alpha Connect LLC, Huron Mountain Communication Company, Peninsula Fiber Network Next Generation Services, LLC Winn Telephone dba Winn Telecom

ROBOCALL MITIGATION

Background

The FCC Order lists three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

1. Traceback:

Winn Telecom commits to responding in a timely manner, within 24 hours, and supporting all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG).

Traceback Contact Information

Name /Title: Owner: Winn Telecom: NOC Manager: Todd Doty
24 hr Support Ph: 989-317-4000
Email: wtnoc@pfllc.net

2. Take Steps to Mitigate Illegal Traffic

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If the Company is notified of traffic patterns consistent with illegal robocalls, or we have reason to suspect illegal robocalling or spoofing is taking place over our network, the Company will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action including blocking such calls, notifying the FCC, and suspension or disconnection of service.

3. Measures to prevent origination of illegal calls.

Know Your Customer:

The Company only serves low risk customers who all have personal interaction with a representative from the Company. All customers are vetted by collecting physical billing address and W-9 information. Representatives verify that the service(s) requested reasonably matches the business needs of the customer and the proposed location. All customers are vetted by maintaining up-to-date physical billing and service addresses and establishing points of contact with account managers, project coordinators, technicians, and billing representatives. If appropriate, the company will collect W-9 and EIN information.

Telephone Number Validation:

Customers use numbers assigned by the Company or ported in using procedures per NANPA.

Network Monitoring:

Winn Telecom has contracted with two vendors, Award Consulting and Trans Nexus, to provide monitoring and reporting systems to analyze high-volume voice network traffic and to identify and monitor patterns consistent with robocalls. The vendor's monitoring systems provide alerts on calling patterns with unusual spikes, traffic patterns, or attempted use of non-validated Telephone Numbers (TN) to detect patterns consistent with illegal robocalls.

Call Blocking:

For calls originating from our network, the Company provides the following Robocall Protection-

- Detailed reporting identifying suspected illegal robocalls and alerts if calls originate where the calling number is invalid, unallocated, on a Do-Not-Originate list.
- If the platform detects suspected robocalling patterns the Company will take appropriate action which may include suspending or terminating the subscriber.
- Supports a real time query to service to determine if a number originating on your

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network could be a robocall. Such calls can be blocked, or the terminating party can be notified via CNAM.

- For each new instance of robocalling using the Operating Service Provider (OSP) TNs, an alert is sent to the OSP in near real time. This alert will result in the OSP (manually) blocking the TN and all TSPs being alerted via CNAM, through an overlay such as "ROBOCALLER". The CNAM alerting helps address instances of spoofing of TNs that are not going through the OSP that owns the number.

4. Acceptable Use Policy

The Company has prepared an Acceptable Use Policy ("Policy") as a guide for its customers to understand the intended and permissible uses of our service, and to prevent exploitation, fraud, and abuse of our unlimited calling plans and features. This Policy is applicable to all our services and can be found at the following link: <https://www.winntel.com>.

CONCLUSION

Winn Telecom on behalf of itself and affiliates submits this robocall mitigation plan to comply with the Federal Communications Commission's Fourth Report and Order (FCC 20-187) and all applicable sections from the Code of Federal Regulations §64.6305. This plan is a work in progress and will be supplemented as the company gains more exposure to and experience with these processes. If any material changes occur, the Company will update this information and filing within 10 business days.