

Easton Telecom Services, L.L.C.

Caller ID Authentication Plan

Updated September 25, 2025

Introduction. Easton Telecom Services, L.L.C. (“Easton”), Federal Registration Number 0009183567, pursuant to Sections 64.6301 and 64.6305 of the Commission’s rules, 47 C.F.R. §§ [64.6301](#), [64.6305](#) and the Commission’s “Best Practices”¹ as amended² adopts this Caller ID Authentication (“Plan”). This Plan is current as of its submission date and may be subject to change as necessary to further comply with amended Commission regulations and requirements.

Exemption. Easton falls under a plain language definition of a Small Voice Service Provider serving less than 100,000 voice service subscriber lines, pursuant to Section 64.6304(a)(2) of the Commission’s rules, [47 C.F.R. § 64.6304\(a\)\(2\)](#), albeit lacks control over network infrastructure necessary to implement STIR/SHAKEN.³ Easton is currently incapable of obtaining a Service Provider Code (“SPC”) token due to Governance Authority policy and is exempt from the requirements of [Section 64.6301](#) until it is capable of obtaining a SPC token as set forth in Section 64.6304(b) of the Commission’s rules, 47 C.F.R. § 64.6304(b). As a non-facilities-based service provider, Easton must defer to its underlying carriers regarding interconnection with upstream providers, and its underlying carriers’ analytics to block illegal traffic that may originate with upstream providers.

Commitment. Pursuant to Section 64.6305 of the Commission’s rules, 47 C.F.R. § [64.6305](#), Easton commits to take all such *reasonable steps* to avoid originating illegal robocall traffic and shall include a commitment to respond fully and in a timely manner 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. As set forth below, Easton has adapted the North America Numbering Council Call Authentication Trust Anchor Working Group’s *Best Practices for the Implementation of Call Authentication Frameworks*⁴ into its Plan.

¹ *Call Authentication Trust Anchor*, WT Docket No. 17-97 *Wireline Competition Bureau Invites Comment on Caller ID Authentication Best Practices*, WC Docket No. 20-324, *Wireline Competition Bureau Issues Caller ID Authentication Best Practices*, DA 20-1526 (December 22, 2020).

² *Including, Advanced Methods to Target and Eliminate Unlawful Robocalls*, *Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17- 97, *Sixth Report and Order*, *Fifth Report and Order*, *Order on Reconsideration*, *Order*, FCC 22-37 (May 20, 2022) and *Call Authentication Trust Anchor*, WC Docket No. 17-97, *Sixth Report and Order*, FCC 23-18 (March 17, 2023); *Seventh Report and Order in Docket 17-59*, CG Docket No. 17-59, FCC 23-37, (May 19, 2023); *Eighth Report and Order*, WC Docket No. 17-97, FCC 24-120 (November 22, 2024); *Eighth Report and Order*, CG Docket No. 17-59, FCC 25-15, (February 28, 2025).

³ *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*, 35 FCC Rcd 3260 (Mar. 31, 2020) (First Caller ID Authentication Report and Order and Further Notice), para. 40.

⁴ *Public Notice*, WC Docket Nos. 17-97 and 20-324, DA 20-1526, Appendix B (December 22, 2020)

Company Contact. The name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues is as follows:

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Corporate Information.

Easton is a privately-owned corporation. Easton is owned by two individuals, one of which is Robert E. Mocas who also serves as Easton's President. Easton has no affiliates, has no subsidiaries, and is not owned by any other entity. The Company's President exerts full control over Easton's operations.

Easton does not operate under any assumed names. Easton operates exclusively as a non-facilities-based Small Voice Service Provider as defined, with a STIR/SHAKEN implementation obligation directly serving end-users as set forth herein. Easton is not a foreign voice service provider, is not an intermediate or gateway provider, does not serve subscribers who are physically located outside of the U.S., and does not act as a wholesale provider originating calls on behalf of another provider or providers. Easton does not maintain an operating company number and does not have direct access to telephone numbers from the North American Numbering Plan Administrator (NANPA) and/or the National Pooling Administrator.

Certification.

Easton certifies that it has not been prohibited from filing in the Robocall Mitigation Database. Easton certifies that it independently reviews its subscriber traffic analytics and does not separately engage a third-party analytics provider. Easton certifies further that it has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing. And Easton certifies that at no time during the prior two years, has Easton been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Reasonable Steps to Prevent Robocalling.

Know Your Customer

Easton fully vets all subscribers before providing service to the subscriber. Easton obtains specific subscriber information including service locations and principals, if commercial subscribers, and verifies location for all subscribers. Further, Easton compares information

provided by the subscriber against underlying carrier records to verify accuracy and authentication and validate subscriber information. Subscribers are served under a service agreement.

Easton monitors its subscribers' traffic for call, originating number and terminating number irregularities in conjunction with its underlying carriers, and should irregularities be determined, will immediately contact the subscriber as part of its investigatory process. Easton does not grant, nor can it grant, right-to-use telephone number resources.

Telephone Number Validation

For new subscribers, Easton will assign telephone numbers to the account, unless the account has ported from another subscriber. Easton will ensure that only those subscriber telephone numbers held by its subscribers may originate traffic. For toll-free numbers, Easton will verify the underlying ten-digit number and ensure that only calls from the assigned numbers may originate calls.

Network Traffic Monitoring, Analysis and Investigation.

Consistent with its commitment above, Easton will respond fully to all traceback requests from the Commission, law enforcement, and the industry traceback consortium as soon as possible and at no time exceeding 24 hours from the time of the request and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Easton coordinates with its underlying carriers to monitor Easton's subscribers' traffic, identify traffic anomalies including, but not limited to, unusually high call volumes to different telephone numbers and disparate geographic areas, over the course of one or more hours, for which Easton will investigate, and to immediately block subscriber service if robocalling is suspected. Confirmation of illegal activity and more than one violation will result in immediate service termination.

The Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

Do-Not-Originate List.

Easton is compiling a reasonable Do Not Originate (DNO) list. Easton's DNO list excludes numbers that are deemed unreasonable for purposes of call origination in accordance with the criteria established pursuant to 47 C.F.R. § 64.1200, as they are discovered. Easton utilizes internal tools to check for DNO numbers by detecting invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes call data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles. The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to subscriber vetting. The identification process includes invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect

and investigate irregular and unexpected calling patterns, originating number use against customer profiles. The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to subscriber vetting.

Refusing Traffic from Unlisted Providers.

In conjunction with its underlying carrier, Easton refuses to accept traffic from unlisted and de-listed providers from the Commission's Robocall Mitigation Database.

Cooperation with the Commission, Industry Traceback Consortium, and Law Enforcement Agencies. Easton avers to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within twenty-four (24) hours,⁵ and to cooperate with such entities in investigating and stopping any illegal robocallers.

If following internal investigation and investigation in conjunction with the industry traceback consortium, Commission, and/or law enforcement agencies, Easton confirms that any subscriber has engaged in – or allowed the engagement of – robocalling, Easton will immediately terminate its provision of service and inform the Commission and Trust Anchor of the identity of the former subscriber and telephone numbers that were involved.

Ongoing Robocall Mitigation.

Easton, in conjunction with its underlying carriers, will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

Easton anticipates that its Plan will evolve as it makes Plan enhancements, as underlying carriers enhance their own plans, and as the Trust Anchor and industry generally gain experience in caller ID authentication protocols.

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⁵ Pursuant to 47 C.F.R. § 64.1200(n)(1) as clarified by the Commission.

Easton avers to update its plan within ten business days from the date of any Plan changes.

September 25, 2025

Easton Telecom Services, L.L.C.

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