



Tele Cloud LLC

Caller ID Authentication Plan

February 26, 2026

I. Introduction.

[Tele Cloud LLC](#) (“Tele Cloud”), Federal Registration Number [0023318249](#), 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 amended,² adopts this Caller ID Authentication (“Plan”). This Plan replaces all previous Plans, is current as of its submission date, and may be subject to change as necessary to further comply with amended Commission regulations and requirements.

II. Company Information

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:

Bryce Hall
Senior Voice Engineer
1 Cattano Ave, Suite 2
Morristown, NJ 07960
Phone: (908) 851-0444
Email: bryce@telecloud.net

Tele Cloud provides local, intrastate, interstate, and international communications services, and enhanced services to commercial and residential subscribers. The Company 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\(a\)\(2\)](#).

Tele Cloud has obtained a Service Provider Code (“SPC”) token and has engaged TransNexus to authenticate and verify caller identification information for all SIP calls originating on Tele Cloud’s network pursuant to [Section 64.6301](#).

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 *See most recently, 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), *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)



II. Company Information, Continued

Tele Cloud is a privately-owned corporation. Tele Cloud is jointly owned by managing members Damon Finaldi, Vincent Finaldi, and Cara Miscia. Tele Cloud has no affiliates, has no subsidiaries, does not operate under an assumed name, and is not owned by any other entity. The Company's three managing members exert full and complete control over Tele Cloud's operations.

Tele Cloud does not operate under any assumed names. Tele Cloud is not an Intermediate nor Gateway provider, does not serve non-U.S. subscribers, and does not serve as a wholesale provider originating calls on behalf of another provider or providers.

Tele Cloud maintains Operating Company Number (OCN) **130L**. Tele Cloud does not have direct access to telephone numbers from the North American Numbering Plan Administrator (NANPA) and/or the National Pooling Administrator.

III. Certification

Tele Cloud certifies that it maintains a service provider code token and that its originating calls are authenticated through [TransNexus](#), under written agreement. Tele Cloud has also deployed analytics applications that automatically analyze subscriber traffic for calling pattern anomalies that could be the result of robocalling subject to company investigation.

Tele Cloud certifies that it has not been prohibited from filing in the Robocall Mitigation Database. Tele Cloud 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 Tele Cloud certifies that at no time during the prior two years, has Tele Cloud 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.

IV. Robocall Mitigation Plan

This Robocall Mitigation Plan addresses the steps Tele Cloud has implemented to eliminate unlawful calls originating on its network, in compliance with applicable Commission rules including:

- Know Your Customer
- Call Abuse Policy
- Caller ID Authentication
- Telephone Number Validation
- Network Traffic Monitoring, Analysis, and Investigation
- Do-Not-Originate List
- Refusing Traffic from Unlisted Providers
- Cooperation with the Commission, Industry Traceback Consortium, and Law Enforcement Agencies



IV. Robocall Mitigation Plan, Continued

Know Your Customer

Tele Cloud has adopted a multi-faceted approach for knowing its subscribers, beginning with a prospective subscriber's initial interaction with Tele Cloud's sales team. Tele Cloud's sales personnel undergo training to identify and screen potential customers effectively.

Tele Cloud provides service exclusively to commercial subscribers. The Company fully vets all subscribers before providing service. Tele Cloud obtains specific subscriber information including service locations and principals and verifies subscriber locations. Further, Tele Cloud compares information provided by the subscriber against underlying carrier records to verify accuracy and authentication and validate subscriber information. Commercial subscribers are served under a service agreement.

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

Call Abuse Policy

Tele Cloud has implemented the following Call Abuse Policy:

Any call originated on the Tele Cloud LLC network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the Tele Cloud, LLC network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.

Tele Cloud's Call Abuse Policy is posted on its web site, <https://telecloud.net/terms-and-conditions> and has been added to its terms of use. Subscribers are periodically notified of Tele Cloud's Call Abuse Policy. Failure to abide by its Call Abuse Policy will result in immediate service termination.

Caller ID Authentication

Pursuant to Section 64.6301, Caller ID Authentication, 47 C.F.R. §§ 64.6301, Tele Cloud authenticates and verifies caller information for calls through its engagement of Transnexus in conjunction with Tele Cloud's Service Provider Code (SPC) token assigned by iconectiv.

TransNexus, authenticates calls generated over Tele Cloud's network using Tele Cloud's assigned SPC token under an established caller ID verification agreement. All domestic and international calls originating from Tele Cloud's network are authenticated, accordingly.



IV. Robocall Mitigation Plan, Continued

Caller ID Authentication, Continued

By incorporating this advanced certificate signing mechanism into its outbound call process, Tele Cloud not only mitigates the risk of fraudulent activities such as caller ID spoofing but also establishes a reliable and secure framework for its subscribers. In so doing, Tele Cloud implements the STIR/SHAKEN caller ID authentication across its entire network and calls originated from its subscribers are compliant with 47 C.F.R. §§ 64.6301.

Telephone Number Validation

For new subscribers, Tele Cloud assigns telephone numbers to the account through its numbering partner, unless the account has ported from another subscriber. Tele Cloud will ensure that only those subscriber endpoints and assigned numbers may originate traffic.

Network Traffic Monitoring, Analysis and Investigation

Tele Cloud has procedures to monitor traffic over its own network and algorithms that help identify traffic anomalies. Tele Cloud's network engineer is experienced in conducting traffic studies, analyzing traffic patterns and conducting root cause investigations. Further, Tele Cloud's network team is trained on robocall mitigation and coordinates with interconnecting carriers to develop procedures for identification and investigation of changed patterns and potential instances of robocalling consistent with the underlying carriers' own caller ID authentication procedures.

Once Tele Cloud begins providing service to new subscribers, Tele Cloud engages in subscriber traffic analysis, to monitor the potential for anomalous traffic patterns. Tele Cloud monitors its subscribers' traffic for originating number and terminating number irregularities, call volume by time of day, and unusual call volume by destination. Should irregularities be determined, Tele Cloud will immediately contact the subscriber as part of its investigatory process to confirm the legitimacy of the calls.

Do-Not-Originate List

Pursuant to the Commission's *Eighth Report and Order* in its Advanced Methods to Target and Eliminate Unlawful Robocalls proceeding, Tele Cloud is compiling a reasonable do-not-originate list. Tele Cloud's do-not-originate 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.



IV. Robocall Mitigation Plan, Continued

Refusing Traffic from Unlisted Providers

Tele Cloud 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

Tele Cloud 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,³ and to cooperate with such entities in investigating and stopping any illegal robocallers that use Tele Cloud's service to originate calls. Tele Cloud will coordinate with its wholesale subscribers for any traceback requests to ensure compliance.

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

V. Commitment

Pursuant to Section 64.6305 of the Commission's rules, 47 C.F.R. § [64.6305](#), Tele Cloud commits to take all such *reasonable steps* to avoid originating illegal robocall traffic as set forth herein, including 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 may attempt to use its service to originate calls.

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

February 26, 2026

Tele Cloud LLC

Cara Miscia
/s/ Cara Miscia

Cara Miscia
Managing Member
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³ Pursuant to 47 C.F.R. § 64.1200(n)(1) as clarified by the Commission.