

U.S. Telecom Long Distance, Inc.

Caller ID Authentication Plan

Updated February 20, 2025

I. Introduction

U.S. Telecom Long Distance, Inc. ("USTLD"), Federal Registration Number [0004964417](#), pursuant to Sections 64.6301 and 64.6305 of the Commission's rules, 47 C.F.R. §§ [64.6301](#), [64.6305](#), as amended¹ and the Commission's "Best Practices"² 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.

With this update, USTLD incorporates amendments to its Plan to further document compliance with Commission Caller ID Authentication rules, most recently including rules promulgated under the *Report and Order* in its Improving the Effectiveness of the Robocall Mitigation Database and Amendment of Part 1 of the Commission's Rules, Concerning Practice and Procedure, Amendment of CORES Registration System proceedings.³

II. Company Information

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:

Robert Young
President
U.S. Telecom Long Distance, Inc.
3960 Howard Hughes Parkway
5th Floor #5001F
Las Vegas Nevada 89109
Email: cs@ustelecomld.com

USTLD is a privately-owned corporation. USTLD's individual owner and principal is Robert Young. USTLD has no affiliates, has no subsidiaries, and is not owned by any other entity. The Company's principal exerts full control over USTLD's operations.

¹ *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).

² *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)

³ *Report and Order*, WC Docket No. 24-213, MD Docket No. 10-234, [FCC 24-135](#) (January 8, 2025),

II. Company Information, Continued

USTLD does not operate under any assumed names. USTLD 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. USTLD 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. USTLD 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.

III. Exemption

USTLD 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.⁴ USTLD 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), 47 C.F.R. § 64.6304(b). As a non-facilities-based service provider, USTLD 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.

IV. Certification

USTLD certifies that it has not been prohibited from filing in the Robocall Mitigation Database. USTLD certifies that it independently reviews its underlying carrier subscriber traffic analytics for anomalies subject to its investigation and does not separately engage a third-party analytics provider. USTLD 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. Further, USTLD certifies that at no time during the prior two years, has USTLD 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.

USTLD will ensure that it will update company information contained in the Commission Registration System (CORES) within ten business days from the date when information changes to reflect up-to-date Company information. Further, pursuant to Section 64.6305(h) of the Commission's rules, 47 C.F.R. § 64.6305(h) USTLD affirmatively certifies and will recertify annually, that any information submitted to the Robocall Mitigation Database is true and correct on or before March 1.

⁴ *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.

V. Robocall Mitigation Plan

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

- Know Your Customer
- 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

Know Your Customer USTLD verifies all existing subscriber information before providing service to the subscriber. USTLD obtains specific subscriber information including service locations and principals if commercial subscribers and verifies location for all subscribers. Further, USTLD submits required information to its underlying carriers who verify accuracy and authentication to validate subscriber information.

USTLD 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 USTLD does not grant, nor can it grant, right-to-use telephone number resources.

Telephone Number Validation. USTLD does not assign telephone numbers to subscribers. USTLD will ensure that only those subscriber telephone numbers held by its subscribers may originate traffic through its underlying carriers. For toll-free numbers, USTLD will verify the underlying ten-digit number and ensure that only calls from the assigned numbers may originate calls also through its underlying carriers.

Network Traffic Monitoring, Analysis and Investigation.

USTLD coordinates with its underlying carriers to monitor USTLD'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, which USTLD will investigate, and to immediately block subscriber service if robocalling is suspected. Confirmation of illegal activity and more than one violation will result in service termination. USTLD relies on its underlying carriers to implement a call authentication protocol for voice calls delivered over the non-IP portions of their networks 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.

V. Robocall Mitigation Plan, Continued

Do Not Originate List. USTLD compiles a reasonable Do Not Originate (DNO) list. USTLD'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. USTLD utilizes 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.

Refusing Traffic from Unlisted Providers.

In conjunction with its underlying carrier, USTLD 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. USTLD 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 that use USTLD's service to originate calls.

If following internal investigation and investigation in conjunction with the industry traceback consortium, Commission, and/or law enforcement agencies, USTLD confirms that any subscriber has engaged in – or allowed the engagement of – robocalling, USTLD 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.

VI. Commitment

Pursuant to Section 64.6305 of the Commission's rules, 47 C.F.R. § [64.6305](#), USTLD 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, USTLD has adapted the North America Numbering Council Call Authentication Trust Anchor Working Group's *Best Practices for the Implementation of Call Authentication Frameworks*⁶ into its Plan.

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

⁶ *Public Notice*, WC Docket Nos. 17-97 and 20-324, DA 20-1526, Appendix B (December 22, 2020)

VI. Commitment, Continued

USTLD will ensure that it will update company information contained in the Commission Registration System (CORES) within ten business days from the date when information changes to reflect up-to-date Company information. Further, pursuant to Section 64.6305(h) of the Commission's rules, 47 C.F.R. § 64.6305(h) USTLD affirmatively certifies and will recertify annually, that any information submitted to the Robocall Mitigation Database is true and correct on or before March 1.

USTLD 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.

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

February 20, 2026

U.S. Telecom Long Distance, Inc.

/s/ Robert Young

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