

Central Telecom Long Distance, Inc.

Caller ID Authentication Plan

Updated February 20, 2026

I. Introduction.

Central Telecom Long Distance, Inc. ("CTLD"), Federal Registration Number [0017288341](#), pursuant to Sections 64.6301 and 64.6305 of the Commission's rules, 47 C.F.R. §§ [64.6301](#), [64.6305](#) as amended,¹ 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, CTLD 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

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:

Deborah Baker
President
Central Telecom Long Distance, Inc.
102 South Tejon Street, 11th Floor
Colorado Springs, CO 80903
Email: dbaker@centraltelecomlongdistance.com

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

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

CTLD 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 CTLD 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, CTLD 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

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

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

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

Telephone Number Validation. CTLD does not assign telephone numbers to subscribers. CTLD will ensure that only those subscriber telephone numbers held by its subscribers may originate traffic through its underlying carriers. For toll-free numbers, CTLD 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. .

CTLD coordinates with its underlying carriers to monitor CTLD'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 CTLD 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. CTLD 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. CTLD compiles a reasonable Do Not Originate (DNO) list. CTLD'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. CTLD 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, CTLD 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. CTLD 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 CTLD's service to originate calls.

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

CTLD 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) CTLD affirmatively certifies and will recertify annually, that any information submitted to the Robocall Mitigation Database is true and correct on or before March 1.

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

CTLD 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.

CTLD avers to update its plan within ten (10) business days from the date of any Plan changes.

February 20, 2026

Central Telecom Long Distance, Inc.

/s/ Deborah Baker

Deborah Baker
President
Central Telecom Long Distance, Inc.
102 South Tejon Street, 11th Floor
Colorado Springs, CO 80903