

Third Generation of Pennsylvania, Inc.

Caller ID Authentication Plan

Updated February 10, 2026

I. Introduction

Third Generation of Pennsylvania, Inc. ("Third Generation"), Federal Registration Number [0020759106](#), 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").

With this update, Third Generation 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

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.

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:

Michael Ray
General Manager
Third Generation of Pennsylvania, Inc.
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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), *Seventh Report and Order*, FCC 23-37 (May 19, 2023), and *Eighth Report and Order*, FCC 24-120 (November 22, 2024) and *Advanced Methods to Target and Eliminate Unlawful Robocalls proceeding*, CG Docket No. 17-59, *Eighth Report and Order* FCC 25-15 (February 28, 2025).

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

Third Generation is a privately-owned corporation. Third Generation is owned by 3G Holdco LLC. 3G Holdco LLC is owned by Davenforth Communication Topco LLC. Davenforth Communication Topco LLC is owned by ***BEGIN CONFIDENTIAL***

END CONFIDENTIAL

Third Generation does not operate under an assumed name. Third Generation 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. Third Generation 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. Third Generation 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

Third Generation 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 Third Generation 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, Third Generation 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

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

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.

or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

IV. Certification, Continued

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

V. Robocall Mitigation Plan

This Robocall Mitigation Plan addresses the steps Third Generation 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. Third Generation verifies all existing subscriber information before providing service to the subscriber. Third Generation obtains specific subscriber information including service locations and principals, if commercial subscribers, and verifies location for all subscribers. Further, Third Generation submits required information to its underlying carriers who verify accuracy and authentication to validate subscriber information.

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

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

V. Robocall Mitigation Plan, Continued

Network Traffic Monitoring, Analysis, and Investigation. Consistent with its commitment above, Third Generation 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.

Third Generation compiles a reasonable Do Not Originate (DNO) list. Third Generation'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. Third Generation 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. . The identification process includes:

- Monitoring the network to identify suspicious traffic patterns
- Limiting customers' capacity via call per second and/or concurrent session limits
- Regularly checking call patterns for possible abusive traffic
- All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees.

The Company severely limits the capabilities of new accounts until these appropriate processes are complete. 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.

Third Generation also coordinates with its underlying carriers to monitor Third Generation'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 Third Generation 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. The Company does not engage third-party analytics vendors.

V. Robocall Mitigation Plan, Continued

Do-Not-Originate List. Third Generation is compiling a reasonable Do Not Originate (DNO) list. Third Generation'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.

Refusing Traffic from Unlisted Providers.

In conjunction with its underlying carrier, Third Generation 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. Third Generation 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 Third Generation's service to originate calls.

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

Third Generation in conjunction with its underlying carrier, 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.

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

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

Third Generation 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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