

cTel No. 1, LLC
Caller ID Authentication Plan
Updated February 13, 2026

I. Introduction.

cTel No. 1, LLC (“cTel”), Federal Registration Number [0034084277](#), 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.

With this update, cTel 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

I. 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:

John Baur
President
cTel No. 1, LLC
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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 *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)..

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

II. Corporate Information, Continued

cTel is a privately-owned corporation. cTel's individual owners are John Baur, President, and James Creason, Principal. The Company's principals exert full control over cTel's operations. cTel is not affiliated with any other entity that provides telecommunications or communications services.

cTel does not operate under any assumed names.

cTel 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. cTel 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. cTel 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.

cTel 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 cTel 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, cTel 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

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

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.

IV. Certification, Continued

Further, pursuant to Section 64.6305(h) of the Commission's rules, 47 C.F.R. § 64.6305(h). cTel 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 cTel has implemented to eliminate unlawful calls originating on its network, in compliance with applicable Commission rules including:

- Subscriber Vetting
- Telephone Number Validation
- Network Traffic Monitoring, Analysis, and Investigation
- Refusing Traffic from Unlisted Providers
- Do-Not-Originate List
- Cooperation with the Commission, Industry Traceback Consortium, and Law Enforcement Agencies

Subscriber Vetting

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

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

Telephone Number Validation

For new subscribers, cTel will assign telephone numbers to the account, unless the account has ported from another subscriber. cTel will ensure that only those subscriber telephone numbers held by its subscribers may originate traffic. For toll-free numbers, cTel 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, cTel 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.

V. Robocall Mitigation Plan, Continued

As a non-facilities-based voice service provider, cTel coordinates with its underlying carriers to monitor cTel'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 cTel will investigate, and to immediately block subscriber service if robocalling is suspected. cTel does not separately engage a third-party analytics vendor. Confirmation of illegal activity and more than one violation will result in immediate subscriber service termination. The Company does not engage third-party analytics vendors.

Refusing Traffic from Unlisted Providers.

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

Do-Not-Originate List.

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

Cooperation with the Commission, Industry Traceback Consortium, and Law Enforcement Agencies.

cTel 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 cTel's service to originate calls.

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

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

VI. Commitment

Pursuant to Section 64.6305 of the Commission's rules, 47 C.F.R. § [64.6305](#), cTel 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.

cTel, 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.

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

cTel 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.

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

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