

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

|                  |   |                      |
|------------------|---|----------------------|
| In the Matter of | ) |                      |
|                  | ) |                      |
| Belthrough LLC   | ) | EB-TCD-24-00037445   |
|                  | ) | EB Docket No. 22-174 |
|                  | ) |                      |

**INITIAL DETERMINATION ORDER AND ORDER TO SHOW CAUSE**

**Adopted: February 19, 2026**

**Released: February 19, 2026**

By the Acting Chief, Enforcement Bureau:

**I. INTRODUCTION**

1. By this Initial Determination Order and Order to Show Cause, the Enforcement Bureau (Bureau) issues its initial determination that Belthrough LLC (Belthrough or Company) has not complied with the requirements in section 64.1200(n)(2) of the Federal Communications Commission's (Commission or FCC) rules for voice service providers. This Initial Determination Order follows the Bureau's September 10, 2025 Notification of Suspected Illegal Traffic (Notice), which identified apparently illegal traffic Belthrough has transmitted as an originating provider and gateway provider and instructed Belthrough to investigate the traffic, block it if necessary, and provide a report to the Bureau within 14 days.<sup>1</sup> Belthrough failed to respond, and the Bureau is not aware of any measures Belthrough has taken to comply with the Notice. Pursuant to section 64.1200(n)(2)(ii) of the Commission's rules, Belthrough now has 14 days to respond to this Initial Determination Order with a final response to our apparent finding and to demonstrate compliance with our rules. If Belthrough fails to provide an adequate response within 14 days or continues to transmit substantially similar unlawful traffic, the Bureau will issue a Final Determination Order.<sup>2</sup> Any provider immediately downstream from Belthrough will then be required to block and cease accepting all traffic received directly from Belthrough beginning 30 days after release of the Final Determination Order.<sup>3</sup> In addition, pursuant to Commission's rules and precedent, the Order to Show Cause directs Belthrough to show cause as to why it should not be removed from the Commission's Robocall Mitigation Database (RMD) for failing to cooperate with the Bureau's investigation. Failure to respond within 14 days will result in removal of Belthrough's certification from the RMD, in which case all voice service providers and intermediate providers will be required to cease accepting calls directly from Belthrough.<sup>4</sup>

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<sup>1</sup> See Letter from Patrick Webre, Acting Chief, FCC Enforcement Bureau, to Brisa Cruz, Belthrough, LLC, 2025 WL 2622184 (Sept. 10, 2025), <https://docs.fcc.gov/public/attachments/DOC-414391A1.pdf> (Notice). The Bureau identified the suspected illegal calls in Attachment A to the Notice.

<sup>2</sup> See 47 CFR § 64.1200(n)(2)(iii).

<sup>3</sup> *Id.* § 64.1200(n)(3).

<sup>4</sup> 47 CFR § 64.6305(g); *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 2573, at 2604-05, para. 62 (2023) (*Sixth Caller ID Authentication Order*).

## II. BACKGROUND

### A. Voice Service Provider Mandatory Blocking Rules

2. Protecting consumers in the United States from the dangers and risks of unwanted and illegal robocalls is the Commission's top consumer protection priority.<sup>5</sup> Callers may be the ones who place illegal calls, but voice service providers can—and sometimes do—facilitate, or even protect, these bad-actor callers.<sup>6</sup> To address the problem, the Commission requires voice service providers to block illegal traffic in some cases.<sup>7</sup> On May 19, 2022, the Commission adopted the *Gateway Provider Order*, which built upon the Commission's prior, permissive call blocking rules to require gateway providers to block illegal traffic when notified of such traffic by the Commission.<sup>8</sup> On May 18, 2023, the Commission expanded the mandatory call blocking framework created in the *Gateway Provider Order* to all voice service providers.<sup>9</sup>

3. The call blocking framework is a three-step process. *First*, providers receive a notification of suspected illegal traffic from the Bureau requiring the provider to investigate the suspected illegal traffic and report the results of the investigation to the Bureau.<sup>10</sup> *Second*, if the provider fails to respond to the notification; the Bureau determines that the response is insufficient; the Bureau determines that the provider is continuing to originate substantially similar traffic; or the Bureau determines that the traffic is illegal despite assertions by the provider, then the Bureau shall issue an Initial Determination Order, pursuant to the Commission's rules.<sup>11</sup> The provider has an opportunity to respond.<sup>12</sup> *Third*, if the Bureau determines that the provider's response to the Initial Determination Order is inadequate (including instances where the provider fails to respond), or if it continues to transmit substantially similar traffic, the Bureau may issue a Final Determination Order mandating all immediate downstream providers to block and cease accepting all traffic that they receive from the provider starting 30 days from release of the Final Determination Order.<sup>13</sup>

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<sup>5</sup> FCC, *Stop Unwanted Robocalls and Texts*, <https://www.fcc.gov/consumers/guides/stop-unwanted-robocalls-and-texts> (last visited Sept. 25, 2025) (“Unwanted calls – including illegal and spoofed robocalls – are the FCC’s top consumer complaint and our top consumer protection priority.”).

<sup>6</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, WC Docket No. 17-97, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, 38 FCC Rcd 5404, 5410, para. 15 (2023) (*Seventh Call Blocking Order*).

<sup>7</sup> *Id.* at para. 17.

<sup>8</sup> *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 in CG Docket No. 17-59, Fifth Report and Order in WC Docket No. 17-97, Order on Reconsideration in WC Docket No. 17-97, Order, Seventh Further Notice of Proposed Rulemaking in CG Docket No. 17-59, and Fifth Further Notice of Proposed Rulemaking in WC Docket No. 17-97, 37 FCC Rcd 6865, 6898, para. 75 (2022) (*Gateway Provider Order*); see also 47 CFR § 64.1200(k)(1)-(3) (listing permissive blocking scenarios such as Do-Not-Originate lists, invalid and unallocated numbers, and reasonable analytics).

<sup>9</sup> *Seventh Call Blocking Order*, 37 FCC Rcd at 5415, para. 29.

<sup>10</sup> See 47 CFR § 64.1200(n)(2)(i)(A).

<sup>11</sup> *Id.* § 64.1200(n)(2)(ii).

<sup>12</sup> *Id.*

<sup>13</sup> See *id.* § 64.1200(n)(2)(iii) (permitting issuance of a Final Determination Order up to one year after release of the Initial Determination Order); *id.* § 64.1200(n)(3); *One Eye LLC Final Determination Order*, EB Docket No. 22-174, 38 FCC Rcd 4211, 4214, para. 8 (EB 2023) (finding that One Eye's failure to respond to the Initial Determination Order was an inadequate response).

**B. RMD Rules and Removal Procedure Under Section 64.6305(g)**

4. The Commission may remove a voice service provider's filing from the RMD that it finds "deficient in some way."<sup>14</sup> To do so, the Commission first contacts the provider, notifying it that its filing is deficient, explaining the nature of the deficiency, and providing 14 days for the provider to cure the deficiency.<sup>15</sup> If the provider fails to cure the deficiency, the Bureau will release an order concluding that a provider's filing is deficient based on the available evidence. The order will direct the provider to—within 14 days—cure the deficiency in its filing and explain why the Bureau should not remove the Company's certification from the RMD.<sup>16</sup> If the provider fails to cure the deficiency or provide a sufficient explanation why its filing is not deficient within that 14-day period, the Bureau will release an order removing the provider from the RMD.<sup>17</sup>

**C. Belthrough's Transmission of Suspected Illegal Robocalls as an Originating and Gateway Provider**

5. Belthrough has transmitted traffic as both a voice service provider and a gateway provider.<sup>18</sup> Belthrough most recently updated its RMD certification on March 11, 2025.<sup>19</sup> The certification contains a declaration under penalty of perjury that the Company has a robocall mitigation program that includes a commitment to "cooperate with [the Commission] in investigating and stopping any illegal robocallers that use its service to originate calls."<sup>20</sup>

6. On September 10, 2025, the Bureau issued the Notice to Belthrough for originating and transmitting apparently illegal traffic.<sup>21</sup> The calls apparently transmitted prerecorded voice messages to wireless telephone numbers without the requisite consent of the called party under the Communications Act of 1934, as amended, and our rules.<sup>22</sup> These calls related to impersonation of Internet Service Providers (ISPs) to defraud consumers of funds, as detailed in the Notice.<sup>23</sup> USTelecom's Industry Traceback Group (ITG)<sup>24</sup> investigated purportedly prerecorded voice message calls made without consent.<sup>25</sup> The ITG conducted tracebacks and determined that the calls originated overseas and that

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<sup>14</sup> See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1902-03, para. 83 (2020) (*Second Caller ID Authentication Order*).

<sup>15</sup> *Sixth Caller ID Authentication Order*, *supra* note 4, 38 FCC Rcd 2573 at 2604, para. 60.

<sup>16</sup> *Id.* (quoting *Global UC Inc*, Removal Order, 37 FCC Rcd 13376, 13378, para. 5 (EB 2022)).

<sup>17</sup> *Id.*

<sup>18</sup> See Notice, 2025 WL 2622184, Attachment A; ITG Subpoena Response (Sept. 19, 2024) on file at EB-TCD-24-00037445 (ITG Sept. 2024 Response); ITG Subpoena Response (June 23, 2025) (on file at EB-TCD-24-00037445) (ITG June 2025 Response).

<sup>19</sup> Belthrough (No. RMD0015088), FCC, Robocall Mitigation Database (filed Mar. 11, 2025).

<sup>20</sup> *Id.*; see also 47 CFR § 64.6305(d)(2)(iii).

<sup>21</sup> See Notice, 2025 WL 2622184.

<sup>22</sup> See *id.* at \*2 & Attachment A (identifying calls); 47 U.S.C. § 227(b)(1)(A)(iii) (requiring callers obtain consent before placing pre-recorded calls to wireless telephone numbers); 47 CFR § 64.1200(a)(1)(iii) (same).

<sup>23</sup> See Notice, 2025 WL 2622184, at \*1-2.

<sup>24</sup> The ITG is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks. See *Implementing Section 13(d) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act)*, EB Docket No. 20-22, Report and Order, 38 FCC Rcd 7561, 7561-62, para. 1 (EB 2023); see also *Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act*, Pub. L. No. 116-105, § 13(d), 133 Stat. 3274, 3287-88 (2019).

<sup>25</sup> See ITG Sept. 2024 Response, *supra* note 18; ITG June 2025 Response, *supra* note 18.

Belthrough acted as the originator for some of the calls and the gateway provider for other calls.<sup>26</sup> The ITG previously notified Belthrough of these calls and provided it access to supporting data identifying each call.<sup>27</sup> Belthrough did not provide the ITG proof of the requisite consent for the calls.<sup>28</sup>

7. The Notice required Belthrough to investigate and block the identified traffic and report the results of the investigation to the Bureau by September 24, 2025.<sup>29</sup> The Notice warned Belthrough that a failure to comply with those obligations could result in the Bureau requiring all immediate downstream providers to block its traffic pursuant to section 64.1200(n)(2) and (3).<sup>30</sup> The Notice further warned Belthrough that failure to respond to the Notice would be grounds for removal from the RMD.<sup>31</sup>

8. On September 10, 2025, the Bureau sent the Notice to Belthrough via certified mail, and on September 24, 2025, the Bureau received a signed certified mail card acknowledging receipt.<sup>32</sup> The Bureau sent an email containing the Notice, with the subject line “Official Correspondence from the Federal Communications Commission,” to Belthrough’s official contact listed in the RMD.<sup>33</sup>

9. Despite returning the certified mail card acknowledging receipt of the Notice, Belthrough continued to transmit apparent robocall and fraudulent traffic over its network, generating at least nine additional tracebacks.<sup>34</sup> ITG identified that these calls as impersonating financial services providers and border protection services.<sup>35</sup> Belthrough again listed itself on the tracebacks as the “calling party,” and under the column “action taken” in response to the traceback stated “[t]he customer has been notified to limit that traffic.”<sup>36</sup> Other than signing the certified mail signature card, Belthrough has not responded to the Notice.

### III. DISCUSSION

#### A. Belthrough May Be Subject to Mandatory Call Blocking

10. The Commission’s rules require Belthrough to investigate and block traffic identified by the Bureau after receiving a notification of suspected illegal traffic.<sup>37</sup> The rules also require Belthrough to

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<sup>26</sup> See *id.*; Notice, 2025 WL 2622184, Attachment A (noting Belthrough’s role as the originator or the gateway provider for each identified call).

<sup>27</sup> See ITG Sept. 2024 Response, *supra* note 18; ITG June 2025 Response, *supra* note 1818.

<sup>28</sup> See *id.* For the two identified calls that Belthrough originated in April 2025, Belthrough claimed to have terminated “that campaign from our network” for one of the calls and “blocked that traffic from our network” for the other. However, Belthrough listed itself as the “calling party” for both calls, rather than identifying the name of its customer(s). Notice, 2025 WL 2622184 at \*2; ITG June 2025 Response, *supra* note 18 .

<sup>29</sup> Notice, 2025 WL 2622184 at \*3-4.

<sup>30</sup> *Id.* at \*4.

<sup>31</sup> *Id.* at \*6.

<sup>32</sup> See Brisa Cruz Belthrough, LLC, PS Form 3811 (Certified Mail Return Receipt). Although signed, the return receipt was undated. *Id.*

<sup>33</sup> Email from Enforcement Bureau TCD to Brisa Cruz, Belthrough, Wednesday, September 10, 2025 16:44:04.

<sup>34</sup> ITG November 21, 2025 Subpoena Response, on file in EB-TCD-00037445 (ITG Nov. 2025 Response).

<sup>35</sup> *Id.*

<sup>36</sup> *Id.*

<sup>37</sup> 47 CFR § 64.1200(n)(2)(i)(A).

report the results of its investigation to the Bureau.<sup>38</sup> The rules direct the Bureau to provide at least 14 days for Belthrough to comply with the Notice.<sup>39</sup>

11. The Bureau issued the Notice to Belthrough on September 10, 2025.<sup>40</sup> The Notice directed Belthrough to take the following actions: (i) promptly investigate the suspected unlawful calls identified in the Notice; (ii) if Belthrough's investigation determined that Belthrough served as the originating or gateway provider for the identified traffic, block all of the identified unlawful traffic within 14 days of the Notice (and continue to block the identified traffic as well as substantially similar traffic on an ongoing basis); and (iii) report the results of Belthrough's investigation to the Bureau within 14 days of the date of the Notice (by September 24, 2025).<sup>41</sup> Other than returning the certified mail acknowledgement card, Belthrough failed to respond the Notice.<sup>42</sup>

12. We direct Belthrough to file a response to this Initial Determination Order. The response should provide an explanation as to why the Bureau should not issue a Final Determination Order mandating that providers immediately downstream from Belthrough block *all* of Belthrough's traffic.<sup>43</sup> Belthrough shall file its response with the Bureau within 14 calendar days of the date of this Initial Determination Order. Failure to respond to this Initial Determination Order or submit an adequate response providing a reasonable basis for why the identified traffic is legal, or continued transmission of substantially similar traffic, will result in the Bureau issuing a Final Determination Order.<sup>44</sup> The Final Determination Order will be published in EB Docket No. 22-174 and serve as notification to all immediate downstream providers that they must block and cease accepting all traffic received directly from Belthrough beginning 30 days after release of the Final Determination Order.<sup>45</sup>

#### **B. Belthrough's RMD Certification Is Deficient.**

13. The FCC established the RMD in 2020 to promote transparency and effective robocall mitigation.<sup>46</sup> Intermediate providers and voice service providers shall only accept traffic from a domestic voice service provider or gateway provider if that provider's certification appears in the RMD.<sup>47</sup> Such filings must include the specific reasonable steps the provider has taken to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program.<sup>48</sup> The Commission's rules require an officer of the provider filing a certification in the RMD to declare, under penalty of perjury, that the information included in the certification is true and correct.<sup>49</sup> The submission of false or inaccurate information makes a certification deficient and may result in an enforcement action against the

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<sup>38</sup> *Id.*

<sup>39</sup> *Id.*

<sup>40</sup> Notice, 2025 WL 2622184 at \*1.

<sup>41</sup> *Id.* at \*3-4.

<sup>42</sup> Other than the Certified Mail Return Receipt, the Commission did not receive any other response from Belthrough, via email, U.S. mail, or other physical or electronic medium.

<sup>43</sup> See 47 CFR § 64.1200(n)(2)(ii)-(iii), (n)(3).

<sup>44</sup> *Id.* § 64.1200(n)(2)(iii).

<sup>45</sup> *Id.* § 64.1200(n)(3).

<sup>46</sup> *Second Caller ID Authentication Order*, *supra* note 14, 36 FCC Rcd 1859, 1902, paras. 82-83.

<sup>47</sup> See *id.* § 64.6305(g)(1), (3). This requirement also extends to accepting traffic from foreign providers using "North American Number plan resources that pertain to the United States in the caller ID field to send voice traffic." *Id.* § 64.6305(g)(2).

<sup>48</sup> See *id.* § 64.6305(d)(2)(ii), (e)(2)(ii).

<sup>49</sup> 47 CFR § 64.6305(d)(3)(ii), (e)(3)(ii), (f)(3)(ii) (each citing 47 CFR § 1.16).

filer.<sup>50</sup> The Bureau may remove deficient filings.<sup>51</sup>

14. Where the deficiency is willful, the certification may be removed from the RMD under a two-step expedited procedure.<sup>52</sup> *First*, the Bureau issues a notice to the provider informing it that its certification is deficient and represents a willful violation, explains the nature of the deficiency and the willful violation, and allows 10 days for the provider to cure the deficiency or explain why its certification is not deficient.<sup>53</sup> *Second*, if the provider fails to cure or establish that there is no deficiency within the 10-day period, the Bureau releases an order removing the provider’s certification from the RMD.<sup>54</sup> An action “is willful if a prohibited act is done intentionally, irrespective of evil intent, or done with careless disregard of statutory requirements.”<sup>55</sup> Belthrough certified in its RMD filing, under penalty of perjury, that it would cooperate with the FCC in investigating and stopping any illegal robocallers that use its service to carry or process calls.<sup>56</sup> The Notice warned Belthrough that “failure to respond to this letter as described above may be used as evidence that the Company’s certification is deficient with respect to its commitment to cooperate.”<sup>57</sup> The Bureau received a certified mail receipt showing that Belthrough received the Notice on September, 2025.<sup>58</sup> Nonetheless, Belthrough did not file a report or take any of the actions called for in the Notice, and it continued to transmit apparently illegal robocall traffic.<sup>59</sup>

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<sup>50</sup> Aside from removing a deficient certification from the RMD, the Commission may impose a forfeiture on filers that submit false or inaccurate information in the RMD. *See Improving the Effectiveness of the Robocall Mitigation Database, Amendment of Part 1 of the Commission’s Rules, Concerning Practice and Procedure, Amendment of CORES Registration System*, WC Docket No. 24-213, MD Docket No., 10-234, Report and Order, FCC 24-135, at 8-9, para. 18 (Jan. 8, 2025) (adopting a \$10,000 base forfeiture for submitting false or inaccurate information to the RMD).

<sup>51</sup> *See Second Caller ID Authentication Order*, *supra* note 14, 36 FCC Rcd at 1903, para. 83 (2020) (noting that if a certification “is deficient in some way,” the Commission may take enforcement action as appropriate, including “removing a defective certification from the database after providing notice to the voice service provider and an opportunity to cure the filing”); *Gateway Provider Order*, *supra* note 8, 37 FCC Rcd at 6882, para. 40 (noting that the rule applies to gateway providers as well as voice service providers); *see also Sixth Caller ID Authentication Order*, *supra* note 4, 38 FCC Rcd at 2573, 2590, para. 31 (2023) (“[A] provider’s program is ‘sufficient if it includes detailed practices that can reasonably be expected to significantly reduce’ the carrying or processing (for intermediate providers) or origination (for voice service providers) of illegal robocalls. Each provider ‘must comply with the practices’ that its program requires, and its program is insufficient if the provider ‘knowingly or through negligence’ carries or processes calls (for intermediate providers) or originates (for voice service providers) unlawful robocall campaigns.” (citations omitted)).

<sup>52</sup> *See Sixth Caller ID Authentication Order*, *supra* note 4, at 2604-05, para. 62 (setting out the two-step expedited procedure and explaining that it applies to situations where a provider “has ‘willfully’ violated its Robocall Mitigation Database filing obligation within the meaning of that term in section 9(b) of the Administrative Procedure Act (APA), 5 U.S.C. § 558(c), which applies to revocation of licenses”); *Coosemans Specialties, Inc. v. Dep’t of Agric.*, 482 F.3d 560, 567 (D.C. Cir. 2007) (“[A]n action [under 5 U.S.C. § 558(c)] is willful if a prohibited act is done intentionally, irrespective of evil intent, or done with careless disregard of statutory requirements.”) (quoting *Finer Foods Sales Co. v. Block*, 708 F.2d 774, 778 (D.C. Cir. 1983)).

<sup>53</sup> *See Sixth Caller ID Authentication Order*, *supra* note 4, at 2605, para. 62.

<sup>54</sup> *See id.*

<sup>55</sup> *Coosemans Specialties, Inc. v. Dep’t of Agric.*, 482 F.3d 560, 567 (D.C. Cir. 2007) (quoting *Finer Foods Sales Co. v. Block*, 708 F.2d 774, 778 (D.C. Cir. 1983)).

<sup>56</sup> *See* Belthrough (No. RMD0015088), FCC, Robocall Mitigation Database (filed Mar. 11, 2025), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robotcall\\_mitigation\\_database&sys\\_id=b058b2201b30b5103c7943bae54bcb27&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robotcall_mitigation_database&sys_id=b058b2201b30b5103c7943bae54bcb27&view=sp).

<sup>57</sup> Notice, 2025 WL 2622184, *supra* note 1, at \*6.

<sup>58</sup> Certified Mail Return Receipt, *supra* note 32.

<sup>59</sup> ITG Nov. 2025 Response, *supra* note 34.

Belthrough's willful failure to cooperate with our investigation—despite its attestations to the contrary—demonstrates that its RMD certificate is deficient. Thus, we can immediately move to an order to show cause.

15. The Bureau directs Belthrough to explain why the Bureau should not remove the Company's certification from the RMD.<sup>60</sup> This Order to Show Cause affords Belthrough notice and an opportunity to cure its deficiency by responding fully to the Notice in accordance with its certification and as required by sections 64.1200(n)(2), and 64.6305(d)(2)(iii), 64.6305(e)(2)(iii), and 64.6305(f)(2)(iii) of the Commission's rules.<sup>61</sup> Alternatively, the Company may explain why its certification is not deficient.

16. Belthrough shall file its response with the Bureau within 14 calendar days<sup>62</sup> of the date of this Order to Show Cause.<sup>63</sup> Failure to respond and correct the deficiency, or provide a sufficient explanation for why Belthrough should retain its certification in the RMD will result in removal of the certification and accompanying filing.<sup>64</sup> Removal of Belthrough's certification from the RMD will require all voice service providers and intermediate providers to cease accepting calls directly from Belthrough.<sup>65</sup> If Belthrough is removed from the RMD, it shall not be permitted to refile unless and until both the Bureau and the Commission's Wireline Competition Bureau consent.

#### IV. ORDERING CLAUSES

17. Accordingly, **IT IS ORDERED** that, pursuant to sections 4(i), 4(j), 227(b), 251(e), and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 227(b), 251(e), 403; sections 0.111, 0.311, 1.1, 1.102(b)(1), and 64.1200(n)(2) of the Commission's rules, 47 CFR §§ 0.111, 0.311, 1.1, 1.102(b)(1), and 64.1200(n)(2); and the *Sixth Caller ID Authentication Order*<sup>66</sup> Belthrough **SHALL FILE** a written response to the Initial Determination Order and Order to Show Cause **within 14 calendar days** from the release date of these two Orders.<sup>67</sup>

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<sup>60</sup> See *Second Caller ID Authentication Order*, *supra* note 14, 36 FCC Rcd at 1903, para. 83 (“Enforcement Actions may include, among others, removing a defective certification from the database after providing notice to the voice service provider and an opportunity to cure the filing . . .”).

<sup>61</sup> 47 CFR §§ 64.1200(n)(1); 64.6305(d)(2)(iii).

<sup>62</sup> While the Commission's RMD rules require responses within 10 days, we are using our discretion to extend the response to 14 days in this instance consistent with the call blocking rules to allow Belthrough to submit a single consolidated response.

<sup>63</sup> See *Sixth Caller ID Authentication Order*, *supra* note 4, 38 FCC Rcd at 2604, para. 60.

<sup>64</sup> See *id.*

<sup>65</sup> 47 CFR § 64.6305(g)(1).

<sup>66</sup> *Sixth Caller ID Authentication Order*, *supra* note 4, 38 FCC Rcd at 2604, paras. 60-62.

<sup>67</sup> 47 CFR § 64.1200(n)(2)(ii).

18. The response must be mailed to the Office of the Secretary, Federal Communications Commission, 45 L Street NE, Washington, DC 20554, ATTN: Enforcement Bureau – Telecommunications Consumers Division. The response must also be e-mailed to the FCC Enforcement Bureau, Telecommunications Consumers Division at [EnforcementBureauTCD@fcc.gov](mailto:EnforcementBureauTCD@fcc.gov), to Daniel Stepanicich, Deputy Division Chief, Telecommunications Consumers Division, at [daniel.stepanicich@fcc.gov](mailto:daniel.stepanicich@fcc.gov), and to David Konuch, Attorney Advisor, Telecommunications Consumers Division, at [David.Konuch@fcc.gov](mailto:David.Konuch@fcc.gov).

19. **IT IS FURTHER ORDERED** that copies of this Initial Determination Order and Order to Show Cause shall be filed in EB Docket No. 22-174 and sent by email and certified mail, return receipt requested, to: Brisa Cruz, Belthrough LLC, 1942 Broadway, Ste 314C, Boulder, CO 80302, and [brisa@belthrough.com](mailto:brisa@belthrough.com).

FEDERAL COMMUNICATIONS COMMISSION

Patrick Webre  
Chief  
Enforcement Bureau