

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

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

FINAL DETERMINATION ORDER AND REMOVAL ORDER

Adopted: March 12, 2026

Released: March 12, 2026

By the Chief, Enforcement Bureau:

I. INTRODUCTION

1. By this Final Determination Order and Removal Order, the Enforcement Bureau (Bureau) finds that Belthrough LLC (Belthrough or Company) has not complied with the requirements of section 64.1200(n)(2) of the Federal Communications Commission’s (Commission or FCC) rules for voice service providers. All providers immediately downstream of Belthrough must block and cease accepting all traffic from Belthrough beginning 30 calendar days after the release of this Final Determination Order. Providers may initiate blocking sooner than 30 calendar days from the release of this Final Determination Order if they provide the Commission with notice and a brief summary of the basis for their determination that Belthrough has failed to effectively mitigate illegal traffic or failed to implement effective measures to prevent new and renewing customers from using its network to originate illegal calls. Furthermore, by this Removal Order, the Bureau removes the certification of Belthrough from the Robocall Mitigation Database (RMD). Removal of Belthrough’s certification from the RMD requires all intermediate providers and voice service providers to cease accepting all calls directly from the Company. Belthrough shall not re-file an RMD certification without the prior approval of the Bureau and the Wireline Competition Bureau (WCB). This Final Determination Order follows the Bureau’s September 10, 2025, Notification of Suspected Illegal Traffic (Notice), and the Bureau’s February 19, 2026, Initial Determination Order and Order to Show Cause (Initial Determination Order). Other than acknowledging receipt of the Notice, Belthrough took no action in response to either the Notice or the Initial Determination Order.

1 See 47 CFR § 64.1200(n)(2).

2 Id. § 64.1200(n)(3).

3 Id.; see id. § 64.1200(k)(4).

4 See 47 CFR § 64.6305(g).

5 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).

6 Belthrough LLC, EB Docket No. 22-174, Initial Determination Order and Order to Show Cause, DA 26-172 (EB Feb. 19, 2026) (Initial Determination Order).

II. BACKGROUND

A. Voice Service Provider Mandatory Blocking Rules⁷

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.⁸ Voice service providers can—and sometimes do—facilitate, or even protect, bad-actor callers.⁹ When bad-actor callers are shielded by bad-actor voice service providers, it is significantly more difficult to stop the calls.¹⁰ To address the problem, the Commission requires voice service providers to block illegal traffic in some cases.¹¹ 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.¹² On May 18, 2023, the Commission expanded the mandatory call blocking framework created in the *Gateway Provider Order* to all voice service providers.¹³

3. Mandatory call blocking pursuant to sections 64.1200(n)(2) and (n)(3) can entail a three-step process if the notified provider fails to take action as directed by the Bureau.¹⁴ *First*, a provider will receive a notification of suspected illegal traffic from the Bureau requiring the provider to investigate the suspected illegal traffic, report the results of the investigation to the Bureau, and block the identified traffic and substantially similar traffic unless it determines the identified traffic is not illegal.¹⁵ *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 to the contrary, then the Bureau will issue an Initial Determination Order.¹⁶ The provider then has an opportunity to respond.¹⁷ *Third*, if the Bureau determines that the provider's response to the Initial Determination Order is inadequate (including

⁷ For purposes of this section, the term “voice service provider” refers to that term as used in section 64.1200 of the Commission's rules, which is based on the definition of “voice service” in 47 CFR § 64.1600(r) and includes intermediate providers.

⁸ FCC, *Stop Unwanted Robocalls and Texts*, <https://www.fcc.gov/consumers/guides/stop-unwanted-robocalls-and-texts> (last visited Feb. 26, 2026) (explaining that “Unwanted calls – including illegal and spoofed robocalls – are the FCC's top consumer complaint and our top consumer protection priority.”).

⁹ *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*).

¹⁰ *Id.*

¹¹ *Id.* at 5415, para. 29.

¹² *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 47 CFR § 64.1200(k)(1)-(3) (listing permissive blocking scenarios such as Do-Not-Originate lists, invalid and unallocated numbers, and reasonable analytics).

¹³ *Seventh Call Blocking Order*, 37 FCC Rcd at 5415, para. 29 (requirements codified at 47 CFR § 64.1200(n)(2)-(3)).

¹⁴ 47 CFR § 64.1200(n)(2)-(3).

¹⁵ *Id.* § 64.1200(n)(2)(i)(A).

¹⁶ *Id.* § 64.1200(n)(2)(ii).

¹⁷ *Id.*

if 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 block and cease accepting all traffic from the provider starting 30 calendar days from release of the Final Determination Order.¹⁸ Downstream providers may choose to initiate blocking sooner than 30 calendar days from the release of the Final Determination Order if, prior to initiating blocking, they provide the Commission with notice and a brief summary of the basis for their determination that the provider failed to effectively mitigate illegal traffic within 48 hours of being notified by the Commission or failed to implement effective measures to prevent new and renewing customers from using its network to originate illegal calls.¹⁹

B. RMD Rules and Removal Procedure and Consequences of Removal Pursuant to Section 64.6305(g)

4. The FCC established the RMD in 2020 to promote transparency and effective robocall mitigation.²⁰ Voice service providers, gateway providers, and non-gateway intermediate providers must file certifications in the RMD.²¹ RMD certifications must, among other things, describe the specific reasonable steps the provider is taking to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program.²² RMD certifications must also include a commitment to respond to all traceback requests from the Commission and to cooperate with the Commission in investigating and stopping any illegal robocallers that use its service to originate, carry, or process calls.²³ An officer of the provider filing a certification in the RMD must declare, under penalty of perjury, that the information included in the certification is true and correct.²⁴ The submission of false or inaccurate information makes a certification deficient and may result in an enforcement action against the filer, including removal of the filing from the RMD.²⁵

¹⁸ *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).

¹⁹ 47 CFR § 64.1200(n)(2)(iii); *see id.* § 64.1200(k)(4).

²⁰ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1902-03, paras. 82-83 (2020) (*Second Caller ID Authentication Order*).

²¹ 47 CFR § 64.6305(d), (e), (f). Paragraph (d) applies to voice service providers; paragraph (e) applies to gateway providers; and paragraph (f) applies to non-gateway intermediate providers. For purposes of this section, the term “voice service provider” is based on the definition of “voice service” in 47 CFR § 64.6300(o) that applies to the RMD requirements in 47 CFR § 64.6305. The terms “gateway provider” and “non-gateway intermediate provider” are defined in 47 CFR § 64.6300(d) and (i).

²² 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), (f)(2)(ii).

²³ 47 CFR § 64.6305(d)(2)(iii), (e)(2)(iii), (f)(2)(ii).

²⁴ 47 CFR § 64.6305(d)(3)(ii), (e)(3)(ii), (f)(3)(ii).

²⁵ *See Second Caller ID Authentication Order*, 36 FCC Rcd at 1903, para. 83 (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*, 37 FCC Rcd at 6882, para. 40 (discussing the same enforcement actions against gateway providers); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2603, para. 57 (discussing the same enforcement actions against non-gateway intermediate providers). The Commission may also 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, 40 FCC Rcd 599, 606, para. 18 (2025) (adopting a \$10,000 base forfeiture for submitting false or inaccurate information to the RMD); *see also Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth

(continued....)

5. The Commission may remove a provider's filing from the RMD that it finds "deficient in some way."²⁶ To do so, the Commission will first contact the provider to notify it that its filing is deficient, explain the nature of the deficiency, and provide 14 days for the provider to cure the deficiency.²⁷ If the provider fails to cure the deficiency, the Bureau will release an order concluding that the 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 provider's certification from the RMD.²⁸ 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's certification from the RMD.²⁹

6. When a provider's violation of the Commission's rules is willful its certification may be removed from the RMD under a two-step expedited procedure.³⁰ An action "is willful if a prohibited act is done intentionally, irrespective of evil intent, or done with careless disregard of statutory requirements."³¹ *First*, the Bureau will issue a notice to the provider informing it that its certification is deficient and represents a willful violation, explain the nature of the deficiency and the willful violation, and allow 10 days for the provider to cure the deficiency or explain why its certification is not deficient.³² *Second*, if the provider fails to cure or establish that there is no deficiency within the 10-day period, the Bureau will release an order removing the provider's certification from the RMD.³³

7. Under the Commission's rules, intermediate providers and voice service providers shall accept calls directly from a domestic voice service provider, gateway provider, or non-gateway intermediate provider only if that provider's certification appears in the RMD.³⁴ Removal of a provider's certification from the RMD therefore requires all intermediate providers and voice service providers to

Report and Order, 38 FCC Rcd 2573, 2590, para. 31 (2023) (*Sixth Caller ID Authentication Order*) ("[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)).

²⁶ *Second Caller ID Authentication Order*, 36 FCC Rcd at 1903, para. 83 (regarding voice service provider certifications); *see also Gateway Provider Order*, 37 FCC Rcd at 6882, para. 40 (adopting the same approach for gateway provider certifications); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2603, para. 57 (adopting same approach for non-gateway intermediate provider certifications).

²⁷ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

²⁸ *Id.* (quoting *Global UC Inc, Removal Order*, 37 FCC Rcd 13376, 13378, para. 5 (EB 2022) (*Global UC Removal Order*)).

²⁹ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

³⁰ *Id.* at 2604-05, para. 62 (describing 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").

³¹ *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)).

³² *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2605, para. 62.

³³ *Id.*

³⁴ 47 CFR § 64.6305(g).

cease accepting all calls directly from the provider, except calls to 911 and other emergency communications numbers.³⁵

C. Belthrough's Transmission of Illegal Robocalls

8. In March 2025, Belthrough certified that it is a voice service provider in the RMD.³⁶ Its 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.”³⁷

9. In 2024 and 2025, the Industry Traceback Group (ITG)³⁸ investigated various prerecorded voice message calls made without the consent of the called party that impersonated Internet Service Providers (ISP).³⁹ The ITG conducted tracebacks and determined that Belthrough acted as the originator for some of the calls and the gateway provider for other calls.⁴⁰ The ITG notified Belthrough of these calls and provided it access to supporting data identifying each call.⁴¹ Belthrough did not provide the ITG proof that the calls had the required consent.⁴²

10. On September 10, 2025, the Bureau issued the Notice to Belthrough.⁴³ The Notice identified seven calls for which Belthrough had been identified by the ITG as the originating or gateway provider.⁴⁴ The Notice explained that the identified calls transmitted prerecorded voice messages to wireless telephone numbers or residential landlines without the requisite consent of the called party and that they were part of a calling campaign that impersonated ISPs.⁴⁵ The Notice required Belthrough to investigate the identified traffic, block substantially similar traffic going forward if Belthrough's investigation showed that the identified traffic was illegal, and report the results of the investigation to the Bureau by September 24, 2025.⁴⁶ The Notice warned Belthrough that a failure to comply with the Notice

³⁵ *See id.*

³⁶ Belthrough (No. RMD0015088), FCC, Robocall Mitigation Database (filed Mar. 11, 2025) (Belthrough RMD Filing). As indicated in the Notice, Belthrough has transmitted traffic as a gateway provider in the past. *See* Notice, 2025 WL 2622184 at *1.

³⁷ Belthrough RMD Filing.

³⁸ 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).

³⁹ 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).

⁴⁰ *Id.*; Notice, 2025 WL 2622184, Attachment A (noting Belthrough's role as the originator or the gateway provider for each identified call).

⁴¹ ITG Sept. 2024 Response, ITG June 2025 Response.

⁴² *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.

⁴³ Notice, 2025 WL 2622184 at *1.

⁴⁴ *Id.* at *2 & Attachment A (identifying calls); *see also* 47 U.S.C. § 227(b)(1)(A)(iii) (requiring callers obtain consent before placing artificial or prerecorded voice calls to wireless telephone numbers); 47 CFR § 64.1200(a)(1)(iii) (same).

⁴⁵ Notice, 2025 WL 2622184 at *1-2.

⁴⁶ *Id.* at *3-4.

could result in the Bureau requiring all immediate downstream providers to block its traffic pursuant to section 64.1200(n)(2)(iii) and (n)(3).⁴⁷ The Notice also warned Belthrough that failure to respond to the Notice may be used as evidence that the Company was deficient with respect to its commitment to cooperate with the Commission and be grounds for removal of its certification from the RMD.⁴⁸

11. 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.⁴⁹ On September 10, 2025, the Bureau also 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.⁵⁰ Despite returning the certified mail card acknowledging receipt of the Notice, Belthrough continued to transmit suspected illegal robocall traffic over its network, generating at least nine additional tracebacks from the ITG.⁵¹ The ITG identified those calls as belonging to robocall campaigns that impersonated financial services providers and border protection services.⁵² Belthrough listed itself on these tracebacks as the “calling party,” and under the column “action taken” in response to the traceback, it stated “[t]he customer has been notified to limit that traffic.”⁵³ Other than signing the certified mail signature card, Belthrough did not respond to the Notice.

12. On February 19, 2026, the Bureau released the Initial Determination Order.⁵⁴ The Initial Determination Order directed Belthrough to file a response within 14 days of the date of the order and stated that the response should include any 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.⁵⁵ The Initial Determination Order also informed Belthrough that its willful failure to cooperate with the Bureau’s investigation demonstrated that its RMD certification was deficient and directed Belthrough to show cause why its certification should not be removed from the RMD.⁵⁶ Belthrough took no action in response to the Initial Determination Order.

III. DISCUSSION

A. Belthrough is Subject to Mandatory Call Blocking

13. The Commission’s rules required Belthrough to investigate traffic identified by the Bureau after receiving a notification of suspected illegal traffic and to block the identified traffic and substantially similar traffic unless it determined the identified traffic was not illegal.⁵⁷ The rules also required Belthrough to report the results of its investigation to the Bureau.⁵⁸ Other than returning the certified mail acknowledgement card, Belthrough failed to provide any response to the Notice.

⁴⁷ *Id.* at *4.

⁴⁸ *Id.* at *5.

⁴⁹ See Brisa Cruz, Belthrough, LLC, PS Form 3811 (on file in EB-TCD-00037445) (Certified Mail Return Receipt). Although signed, the return receipt was undated. *Id.*

⁵⁰ Email from Enforcement Bureau TCD to Brisa Cruz, Belthrough, Wednesday, Sept. 10, 2025, 10:44 [EST] (on file in EB-TCD-00037445).

⁵¹ ITG November 21, 2025 Subpoena Response (on file in EB-TCD-00037445) (ITG Nov. 2025 Response).

⁵² *Id.*

⁵³ *Id.*

⁵⁴ Initial Determination Order, DA 26-172.

⁵⁵ *Id.* at 5, para. 12.

⁵⁶ *Id.* at 6-7, paras. 14.

⁵⁷ 47 CFR § 64.1200(n)(2)(i)(A).

⁵⁸ *Id.*

14. The Bureau then directed Belthrough to file a response to the Initial Determination Order.⁵⁹ Specifically, The Initial Determination Order required Belthrough to 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.⁶⁰ The Initial Determination Order directed Belthrough to file its response with the Bureau within 14 calendar days of the date of the Initial Determination Order.⁶¹ Furthermore, the Bureau advised the Company that failure to respond to the 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, would result in the Bureau issuing a Final Determination Order.⁶² Belthrough did not provide any response to the Initial Determination Order.

15. Belthrough did not respond to the Notice or the Initial Determination Order in any way. The Bureau therefore finds that Belthrough has failed to comply with its obligations under section 64.1200(n)(2) of the Commission’s rules.⁶³ This Final Determination Order serves as notification to all immediate downstream providers that they must block and cease accepting all traffic received directly from Belthrough beginning 30 calendar days after the release date of this Final Determination Order.⁶⁴ Any provider that chooses to initiate blocking sooner than 30 calendar days from the release of this Final Determination Order may do so consistent with section 64.1200(k)(4) of the Commission’s rules.⁶⁵

B. Belthrough’s Certification is Removed From the RMD

16. 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 originate calls.⁶⁶ The Notice warned Belthrough that, “failure to respond to this [Notice] . . . may be used as evidence that the Company’s certification is deficient with respect to its commitment to cooperate.”⁶⁷ The Bureau received a certified mail receipt on September 24, 2025, showing that Belthrough received the Notice.⁶⁸ Nevertheless, Belthrough did not file a report or take any of the actions called for in the Notice, and it continued to transmit suspected illegal robocall traffic.⁶⁹

17. On February 19, 2026, the Bureau ordered Belthrough, in the Initial Determination Order, to show cause why its certification should not be removed from the RMD.⁷⁰ The Bureau explained that Belthrough’s failure to cooperate with its investigation—despite its attestation in its certification to cooperate—was willful and demonstrated that its RMD certification was deficient.⁷¹ The Bureau directed

⁵⁹ Initial Determination Order, DA 26-172, at 1, 5, paras. 1, 12.

⁶⁰ *Id.*

⁶¹ *Id.*

⁶² *Id.*

⁶³ See 47 CFR § 64.1200(n)(2)(iii).

⁶⁴ *Id.* § 64.1200(n)(3).

⁶⁵ *Id.*; *id.* § 64.1200(k)(4) (allowing for permissive blocking of calls from an originating or intermediate provider if certain conditions are met).

⁶⁶ Belthrough RMD Filing.

⁶⁷ Notice, 2025 WL 2622184, at *5.

⁶⁸ Certified Mail Return Receipt.

⁶⁹ See ITG Nov. 2025 Response.

⁷⁰ Initial Determination Order, DA 26-172, at 7, para. 15.

⁷¹ *Id.* at 6-7. para. 14.

Belthrough to explain why the Bureau should not remove the Company's certification from the RMD.⁷² The Initial Determination Order directed Belthrough to file its response within 14 calendar days and advised that a failure to respond would result in removal of its certification from the RMD.⁷³

18. Belthrough failed to respond. Therefore, Belthrough's certification shall be removed from the RMD. All voice service providers and intermediate providers shall cease accepting calls directly from Belthrough within two business days of the release date of this Removal Order.⁷⁴ Belthrough shall not be permitted to refile unless and until both the Bureau and WCB consent.

IV. ORDERING CLAUSES

19. 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*,⁷⁵ all immediate downstream providers **MUST BLOCK AND CEASE TO ACCEPT ALL TRAFFIC** directly from Belthrough **beginning no later than 30 calendar days** after the release date of this Final Determination Order and Removal Order.⁷⁶

20. **IT IS FURTHER ORDERED** that Belthrough is **IMMEDIATELY REMOVED** from the Robocall Mitigation Database as of the release date of this Final Determination Order and Removal Order.

21. **IT IS FURTHER ORDERED** that within **two business days** of the release of this Final Determination Order and Removal Order all intermediate providers and voice service providers **MUST CEASE ACCEPTING TRAFFIC** directly from Belthrough.

22. **IT IS FURTHER ORDERED** that Belthrough shall not refile in the Robocall Mitigation Database unless and until both the Wireline Competition Bureau and the Enforcement Bureau consent.

23. **IT IS FURTHER ORDERED** that pursuant to section 1.102(b) of the Commission's rules, 47 CFR § 1.102(b), this Final Determination Order and Removal Order **SHALL BE EFFECTIVE** upon release.

⁷² *Id.* at 7, para. 15.

⁷³ *Id.* at 7, para. 16.

⁷⁴ See 47 CFR § 64.6305(g)(1); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2603, para. 58; *Global UC Removal Order*, 37 FCC Rcd at 13379, para. 8.

⁷⁵ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604-05, paras. 60-62.

⁷⁶ 47 CFR § 64.1200(n)(3). We note that downstream providers will be required to cease accepting traffic directly from Belthrough on a shorter timeframe pursuant to paragraphs 18 and 21 of this Final Determination Order and Removal Order.

24. **IT IS FURTHER ORDERED** that copies of this Final Determination Order and Removal Order 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.

FEDERAL COMMUNICATIONS COMMISSION

Patrick Webre
Chief
Enforcement Bureau