

LATINO COMMUNICATIONS CORP

FCC Robocall Mitigation Plan

Latino Communications is committed to preventing illegal robocalls from transiting through our network. This updated mitigation plan outlines the specific strategies, systems, and processes implemented to detect, trace, and block illegal robocall activity. Further, pursuant to paragraph 46 of the *Sixth Caller ID Authentication Report and Order* (FCC 23-18), Latino Communications submits information regarding its principles and subsidiaries in Appendix A, and provides the following additional information pursuant to 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), and (f)(2)(ii).

I. REASONABLE STEPS

Describe the specific reasonable steps the provider has taken to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program. State how such steps satisfy the provider's obligation to know its customers or to know its upstream providers, as applicable.

Know Your Customer:

- **Customer Verification:** Latino Communications implements a thorough vetting process for new customers, including Know Your Customer (KYC) and Know Your Upstream Provider (KYUP) evaluations. This process involves examining the type of service requested by the prospective customer and reviewing their website to confirm the presence of functional links and the absence of fictitious names. Additionally, Latino Communications assesses the customer's history for any significant number of ITG traceback requests and may consult with industry contacts to identify potential concerns. Furthermore, the company verifies that any prospective customer is classified as a provider by the FCC, registered in the FCC's robocall mitigation database, and maintains that registration. Any information provided by the prospective customer is cross-checked with publicly available details from their website or other sources.
- **Customer Monitoring:** Latino Communications continuously monitors its customers traffic patterns to detect deviations indicative of robocall activities. ANI analysis is used to identify and block originating telephone numbers from sending calls that are believed to be unlawful based on repeat attempts to reach Latino Communications network. Immediate action is taken if suspicious patterns are observed.
- **Customer Termination:** Latino Communications retains contractual authority to terminate customer accounts that violate applicable laws, such as the *Telephone Consumer Protection Act*. This authority is enforced as necessary. In compliance with relevant legal requirements, Latino Communications may also close accounts if it determines that any entity or individual linked to the account has been designated by the FCC or FTC as an illegal robocaller or has neglected to respond to traceback requests.

Traffic Blocking:

Latino Communications automatically blocks illegal robocall traffic using state-of-the-art systems designed to detect and stop suspicious calls immediately. These systems are continuously updated to align with evolving regulatory requirements and robocall patterns.

Real-Time Alerts:

Our systems generate real-time alerts for flagged traffic, enabling the security team to review or block calls as necessary.

II. SYSTEMS & ANALYTICS

Describe the analytics system(s) used to identify and block illegal traffic. Indicate whether the provider uses a third-party analytics vendor, and if so, provide the name of each such vendor.

- **In-House Analytics Tools:** Latino Communications Corp uses an advanced, real-time analytics system to monitor traffic patterns. This system identifies anomalies consistent with robocall traffic, such as high call volumes, rapid setup times, low call durations and geographic inconsistencies.
- **Third-Party Analytics Vendors:** Latino Communications Corp collaborates with external analytics vendors to enhance its detection capabilities.
- **Vendor(s) name(s):** ClearIP from Transnexus, Ringer.tel

III. COMPLIANCE & IMPLEMENTATION

STIR/SHAKEN:

- ***Caller ID Authentication.*** Latino Communications Corp adheres to the STIR/SHAKEN standards for caller ID authentication, which helps prevent caller ID spoofing. This framework authenticates and verifies calls to ensure that calls with accurate caller ID information are labeled as such, while potentially fraudulent calls are flagged.
- ***STIR/SHAKEN Compliance for International Traffic.*** Given that Latino Communications Corp processes international traffic, we ensure compliance with the FCC's regulations for international call handling. For international calls entering the U.S., we apply similar authentication measures or use third-party solutions to assess call authenticity where STIR/SHAKEN may not be applicable.

Traceback:

- *Cooperation with Traceback Authorities.* Latino Communications Corp is fully committed to cooperating with traceback requests from the FCC and other authorized entities. Upon receiving a traceback request, we respond promptly, providing all relevant call data to assist with identifying the source of illegal robocall traffic and blocking.
- *Internal Recordkeeping.* Detailed call records of call origination and termination are maintained to facilitate efficient response to traceback requests and to uphold compliance with federal standards.

Handling of International Traffic:

- *International Traffic Monitoring.* Latino Communications Corp has specialized processes for handling international traffic. Calls entering from international sources are subject to our analytics system, with specific parameters configured to flag potentially illegal traffic originating abroad.
- *Compliance with International Call Standards.* Latino Communications Corp ensures that international traffic complies with both U.S. and relevant foreign regulations. Where STIR/SHAKEN is not applicable, alternative verification methods are employed to assess call legitimacy.

Robocall Certification:

- Latino Communications Corp complies with 47 CFR § 64.6305, maintaining an updated certification in the Robocall Mitigation Database. All filings, including responsible contact information, are updated within ten business days of any change. Ongoing monitoring and immediate actions are part of our commitment to FCC standards.

Continuous Improvement and Reporting:

This Robocall Mitigation Plan undergoes quarterly reviews to ensure all information, systems, and strategies are current and compliant with FCC requirements.

Records and Documentation:

Latino Communications Corp. maintains comprehensive records of all mitigation measures and will provide reports to the FCC upon written request. Jose Luis Valdes serves as the company's contact for records and documentation related to this Robocall Mitigation Plan.

Law Enforcement:

In the two years prior to this filing, neither the filing entity nor any entity for which the filing entity shares common ownership, management, directors, or control, has 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 the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

APPENDIX A: Principles & Subsidiaries

Pursuant to paragraph 46 of the *Sixth Caller ID Authentication Report and Order* (FCC 23-18), Latino Communications hereby provides information regarding its principals, affiliates, subsidiaries, and parent companies, and any principal(s) that exercise management or control of Latino Communications. While the Commission has not specified the information required to fulfill this requirement, Latino Communications submits that the information provided in Table 1 is sufficient to establish that none of the principals nor any related entity has been prohibited from filing in the Robocall Mitigation Database.

- **Latino Communications Corp.**

Established:	1998
State of Incorporation:	Texas
Primary Business:	Telecommunications services, including long-distance services and termination
Principles:	The following individuals exercise management and/or control over Latino Communications Corp: Jorge Lastra, CEO Abelardo Hoyos, CFO Jose Luis Valdes, CTO
Statement:	Latino Communications Corp ensures that all principals and related entities are not prohibited from filing in the Robocall Mitigation Database. The company regularly reviews its corporate structure to maintain compliance with FCC requirements and promptly updates any changes in ownership or management.

- **Estoril Investments, LLC**

Status:	Subsidiary
Ownership:	100% owned by Latino Communications Corp.
Role:	Estoril Investments, LLC, is a holding company and does not engage in the provision of telecommunications services. Accordingly, it does not have any operational role in the management or implementation of Latino Communications Corp's robocall mitigation strategies.

- **CK DFW Partners, Ltd.**

Status:	Subsidiary
Ownership:	0.1% owned by Latino Communications Corp; 99.9% owned by Estoril Investments, LLC
Role:	CK DFW Partners Ltd. operates as a catering company and is not involved in telecommunications services. Consequently, it does not participate in or influence Latino Communications Corp's robocall mitigation operations.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 24, 2026, in Irving, TX.

Jose Luis Valdes
Chief Technology Officer and Director of Operations
Latino Communications Corp.