

Overview

This document constitutes Infracel's Robocall Mitigation Plan. Infracel is a Colombian wireless telecommunications company, owned by América Móvil. A Robocall Mitigation Plan will be deemed sufficient by the Federal Communications Commission (FCC), if the voice service provider:

- includes detailed practices that can reasonably be expected to significantly reduce the origination of illegal robocalls,
- complies with the practices it describes, and
- participates in industry traceback efforts.

1 Objective and Scope

The objective is to define Infracel Robocall Mitigation Plan. Infracel's commitment is to prevent, as much as reasonably possible, illegal calls (robocalls) from originating in its network, as well as monitoring incoming calls to its network.

2 Use Policy

Infracel has adopted Acceptable Use Policy ("Política de Uso Justo") and / or Anti-Fraud Policy ("Política Antifraude en el Uso de Servicios Ilimitados") and / or Policy to prevent prohibited practices ("Política para prevenir prácticas prohibidas") (collectively, "Policies") that describe prohibited practices and the corresponding consequences of engaging in those practices. The company makes the Policies available on its website to its customers and subscribers. In accordance with the Policies, customers and subscribers may not use the Infracel network, products and / or services to engage in, encourage or promote any, including, but not limited to, the use of the Infracel platform for dialing, robocalls, telemarketing, high volume fax, text messaging, voicemail transmission or any other transmission that violates any statute or regulation in the countries where the company operates. The Policies specify that customer access to the Infracel network, products and / or services may be restricted or suspended for violation of the Policies, always in compliance with the applicable regulations.

In the service contract that the client signs with Infracel, obligations are established for the client to use the contracted service only for their personal use, and not to use it at any time to carry out the prohibited practices defined in the contract.

Under the service contract, a prohibited practice includes several activities, including: (i) using the service as call center lines for telephone contact campaigns and / or for carrying out and sending advertising, alerts, etc., (ii) using the service as a gateway sending bypass type communications; (iii) using the service for spam-type messages; (iv) using the service for fraudulent, criminal or illegal purposes.

If it is detected that the customer engages in any of the aforementioned prohibited practice, Infracel reserves the right to pursue the administrative, civil and / or criminal actions that correspond permitted under the law; including, suspend totally or partially, temporarily or permanently the provision of services, always in compliance with the applicable laws and regulations.

3 Know your Customer Protocols. Infracel has a vetting process of its clients and subscribers that includes collecting information, such as:

For Residential/Consumer Services: Infracel requires customers to provide their full legal name (as reflected on government identification), residential address (confirmed through verifiable means such as a telephone or electricity bill), contact phone number(s) and email address. New or renewing customers are also required to affirmatively acknowledge and accept Infracel's terms and conditions associated with use of the service.

For Enterprise Services: Infracel conducts appropriate due diligence on new/renewing customers, such as a credit check, and confirmation of the physical business address. Customers are also required to provide a Certificate of Incorporation and/or company tax number, company website, and a valid email address matching the company domain.

Infracel also considers whether any enterprise customer has been the subject of: (1) any formal written request from a government agency, subpoena, civil investigative demand, or other complaint; or (2) any lawsuit filed by a regulatory agency, or any other law enforcement action by any other state or federal agency (this review could also include any trade or fictitious names/aliases under which the company operates).

4 Review Existing Contractual Terms and Amend as Appropriate.

Infracel includes relevant provisions in its contracts with customers and subscribers that can reasonably be expected to significantly reduce the origination of illegal robocalls. For example, Infracel includes the following types of provisions:

- Payment Terms: Infracel payments through verifiable methods, including checks, debit cards, credit cards, electronic bank transfers, etc. Infracel expressly prohibits payment through other non-traceable mechanisms such as gift cards, cryptocurrencies, etc. In accordance with tax law, Infracel limits the acceptance of cash payment by the allowed amount.
- Contractual Provisions: Infracel service contracts (particularly for enterprise customers) include provisions that: (a) require the lawful use of the service; (b) prohibit number spoofing; (c) require cooperation with law enforcement requests; and (d) enable Infracel to suspend service for customers originating illegal robocalls, or otherwise using the services unlawfully.

5 Monitoring

Infracel's network operation center monitors network traffic to assure the service and quality. This is performed on a 24/7 basis.

Infracel has a continuous monitoring and related reporting protocol to analyze network traffic, such as inbound and outbound high-volume traffic in order to identify unusual spikes and suspicious patterns. Infracel also validates international traffic through monitoring platforms to identify patterns of irregular activity and, if necessary, engage in mitigation and control.

6 Investigating Suspicious Traffic

Infracel has a multidisciplinary group that is dedicated to collaborate in case of a threshold's control is broken and alarm is triggered or in case of a specific request.

Infracel takes the following steps once it has identified suspicious traffic:

- (a) Once an anomalous behavior is detected, the customer profile is analyzed with personnel trained in the subject.
- (b) If company personnel is unable to determine the legitimacy of the traffic, the client is contacted and a further investigation is carried out.
- (c) If company personnel is still unable to determine the legitimacy of the traffic, the company proceeds to suspend service, always in compliance with the applicable regulations.

Infracel collaborates with other carriers expeditiously and in good faith on any investigation of suspicious activity.

Infracel cooperates with industry groups to share best practices and fraud scenarios and discuss solutions that are reasonably designed to minimize prevent illegal, abusive or irresponsible behavior, including, illegal robocalls. For instance, Infracel collaborates with the Fraud Security Group of the GSMA.

Lastly, Infracel is part of the America Móvil group, which is constantly sharing the experiences of each subsidiary with respect to fraudulent activities -- including illegal robocalls – as well as best practices to quickly detect and prevent such practices. This permits the subsidiaries to benefit from each other's experiences and solutions.

7 Suspending/Mitigating Illegal Traffic.

When suspicious traffic has been identified and verified with further investigation, the client or subscriber's service is immediately suspended, according to the local requirements regulations.

8 Participation in fraud-centric industry organizations.

Currently AMX subsidiaries are members of the Fraud and Security group of the GSMA and the TM-Forum.

9 U.S.-bound Voice Traffic

Infracel's traffic originating on its network enters the USA through intermediate operators which are listed on the FCC's Robocall Mitigation Database as having either deployed the STIR-SHAKEN solution or having an appropriate robocall mitigation plan in place.

10 Glossary

FCC	U.S. Federal Communications Commission
Infracel	América Móvil subsidiary
STIR	Secure Telephony Identity Revisited. Standardized by IETF and defines a signature to verify the calling number, and specifies how it will be transported in SIP
SHAKEN	Signature-based Handling of Asserted information using toKENs. Framework developed by the ATIS/SIP Forum IP-NNI task force to provide STIR implementation profile for service providers,

STIR & SHAKEN will be the basis for authenticating calls and facilitating the ability to trust the caller ID information.