

Claro Enterprise Solutions, LLC

Robocall Mitigation Plan

Last updated: February 25, 2026

In accordance with the FCC's requirements for Robocall Mitigation database filings, this document constitutes Claro Enterprise Solutions, LLC's ("Claro Enterprise Solutions" or "CES") updated Robocall Mitigation Plan.

Claro Enterprise Solutions is an indirect subsidiary of América Móvil, S.A.B. de C.V. ("América Móvil"), a Mexican holding company that owns several telecommunications providers around the world. Claro Enterprise Solutions is a provider of network connectivity and technology services to enterprise customers and is also a transit provider for wholesale voice traffic.

A. General/Contact Information

Business name: Claro Enterprise Solutions, LLC

Primary address: 3350 SW 148th Avenue, Suite 400, Miramar FL 33027

Other business name(s) in use: None

All business names previously used: Telmex USA, L.L.C.

Operating Company Number (OCN): 740J

Claro Enterprise Solutions is not a foreign provider

Information on the provider's principals, affiliates, subsidiaries, and parent companies:

Claro Enterprise Solutions is an indirect subsidiary of Sercotel, S.A. de C.V., a Mexican holding company. Sercotel is a wholly owned subsidiary of América Móvil, a Mexican holding company. In the United States, Claro Enterprise Solutions is a direct subsidiary of Latam Telecommunications, L.L.C., which receives U.S.-bound traffic from América Móvil's foreign subsidiaries and delivers it to U.S. carriers, who in turn deliver the traffic to their own end-users. Claro Enterprise Solutions' affiliates in the United States include Puerto Rico Telephone Company, Inc. d/b/a Claro Puerto Rico. As of the date of this filing, CES' officers and directors are: Andres Mosquera, Luis Segovia and Cori Reitman.

Name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues:

Cori Reitman
General Counsel and Corporate Secretary
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B. Provider Classification Information

1. Role the provider is playing in the call chain:

CES is a gateway provider with a STIR/SHAKEN obligation as well as a non-gateway intermediate provider with a STIR/SHAKEN obligation.

2. STIR/SHAKEN implementation status:

CES has fully implemented the STIR/SHAKEN authentication framework on its network.

C. Robocall Mitigation Plan

This section describes the specific reasonable steps that Claro Enterprise Solutions has taken to avoid, as applicable, the carrying of illegal robocall traffic as part of its robocall mitigation program.

1. Implementation of the STIR/SHAKEN authentication framework

CES has configured and fully implemented the STIR/SHAKEN authentication framework on its network. Furthermore, Claro Enterprise Solutions is a direct subsidiary of Latam Telecommunications, L.L.C. which has fully implemented the STIR/SHAKEN authentication framework on its entire network.

2. Unaltered Treatment of Header Information

Consistent with the FCC's rules for intermediate providers, CES passes unaltered to the subsequent intermediate provider or voice service provider in the call path any authenticated caller identification information it receives with a SIP call.

3. Responding to Traceback Requests

CES commits to respond fully and within 24 hours to all traceback requests from the FCC, 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 carry or process calls.

4. Acceptable Use and Anti-Fraud Policies

Claro Enterprise Solutions has policies that describe prohibited practices and the corresponding consequences of engaging in those practices. Claro Enterprise Solutions makes these policies available through its service agreements. In accordance with these policies, customers may not use the Claro Enterprise Solutions network, products and / or services to engage in activity that violates any statute or regulation in the countries where the company operates. The Policies specify that customer access to the Claro Enterprise Solutions network, products and / or services may be restricted or suspended for violation of these policies or applicable regulations.

With respect to any traffic received from any non-U.S. subsidiaries of América Móvil, all have adopted Acceptable Use and/or Anti-Fraud Policies that prohibit their customers from using the subsidiaries' networks, products and/or services to engage in, encourage or promote illegal robocalls, consistent with the foreign laws and regulations applicable to such subsidiaries. Because of the relationship among América Móvil subsidiaries, Claro Enterprise Solutions is able to address any illegal robocalls that might originate with an América Móvil non-U.S. subsidiary's customer.

5. Implementation of Know-Your-Customer Protocols

Claro Enterprise Solutions conducts due diligence on new or renewing customers, such as a credit check, D&B report, taxpayer identification number and confirmation of the physical business address.

CES also considers whether any 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 (3) 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).

CES reviews the robocall mitigation database to confirm the robocall mitigation plans of carriers that seek to do business with Claro Enterprise Solutions.

6. CES Has Existing Contractual Terms That Mitigate Illegal Robocalls

CES includes relevant provisions in its contracts that can reasonably be expected to significantly reduce the origination of illegal robocalls, including the following:

Payment Terms: CES only accepts payments through verifiable methods, including checks, credit cards, electronic bank transfers, etc. CES expressly prohibits payment through other non-traceable mechanisms such as cash, gift cards, cryptocurrencies, etc.

Contractual Provisions: CES service contracts 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 CES to suspend or terminate service for using the services in a manner other than as permitted by the agreement and/or by law.

Since 2021, Claro Enterprise Solutions has included a clause in its wholesale service contracts requiring carriers to warrant implementation of a “STIR/SHAKEN” call authentication framework or other robocall mitigation practices, including but not limited to a robocall mitigation program, in which it (i) takes reasonable steps to avoid originating illegal robocall traffic and (ii) commits to cooperate in investigating and stopping any robocalls, i.e., blocks calls believed to be illegal.

7. CES Monitors and Investigates Suspicious Traffic

CES has a continuous monitoring and related reporting protocol to analyze its inbound and outbound network traffic. CES monitors for high-volume inbound and/or outbound traffic in order to identify unusual spikes and suspicious patterns. CES also validates international traffic through monitoring platforms to identify patterns of irregular activity and, if necessary, engage in mitigation and control. CES does not rely on third-party call analytics systems. CES has a multidisciplinary group that investigates suspicious traffic and is dedicated to collaborating with relevant stakeholders in case an alarm is triggered or in the case of a specific request for investigation. CES utilizes its own internal resources, systems, and frameworks to analyze its network for suspicious robocall traffic

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

1. the customer profile is analyzed by appropriately trained personnel.
2. If company personnel are unable to determine the legitimacy of the traffic, the client is contacted and a further investigation is carried out.
3. If company personnel are still unable to determine the legitimacy of the traffic, the company proceeds to suspend service, always in compliance with the applicable regulations.

CES collaborates expeditiously and in good faith on any investigation of suspicious activity.

8. Blocking Following Commission Notification of Suspected Illegal Traffic

In accordance with the FCC’s rules, Claro Enterprise Solutions is prepared to block, rather than simply effectively mitigate, identified illegal traffic when it receives actual written notice of such traffic by the FCC through its Enforcement Bureau. To comply with this requirement, CES will block traffic that is substantially similar to the identified traffic on an ongoing basis.

9. Participation in Fraud-Centric Industry Organizations and Frameworks

Claro Enterprise Solutions, as part of the América Móvil group, participates in the Fraud and Security group of the GSMA and the TM-Forum. Furthermore, the affiliates of the América Móvil group constantly share 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.

D. Certifications

1. Filing in the Robocalling Mitigation Database:

Claro Enterprise Solutions certifies its prior certification filed in the Robocall Mitigation Database has not been removed by FCC action, nor has it been prohibited from filling in the Robocall Mitigation Database pursuant to a law enforcement action.

2. Enforcement Actions and Investigations:

Claro Enterprise Solutions is not subject to a Federal Communications Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing. Furthermore, neither Claro Enterprise Solutions nor any entity with which Claro Enterprise Solutions 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 Claro Enterprise Solutions transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description in the previous two years.

Respectfully submitted,

Cori Reitman

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