

LATAM Telecommunications, LLC
Robocall Mitigation Plan
February 2026

Consistent with the rules and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following Robocall Mitigation Plan details the policies and practices that LATAM Telecommunications, LLC (“LATAM” or “Company”) has established to prevent unlawful robocalls for from being carried on its network.

LATAM is a subsidiary of América Móvil, S.A.B. de C.V. (“América Móvil”), a Mexican holding company that owns several telecommunications providers around the world. The Company primarily provides U.S.-bound intermediate transport services for América Móvil non-U.S. subsidiaries. Specifically, LATAM 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. LATAM is a transit provider that does not originate or terminate any traffic on its network, nor does it have direct access to NANP resources.

A. General/Contact Information

Business name: LATAM Telecommunications LLC,

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

Other business name(s) in use: None

All business names previously used: None

Information on the provider’s principals, affiliates, subsidiaries, and parent companies: LATAM is a majority-owned subsidiary of Sercotel, S.A. de C.V., a Mexican holding company. In turn, Sercotel is a wholly owned subsidiary of América Móvil, a Mexican holding company. LATAM’s affiliates in the United States include Puerto Rico Telephone Company, Inc. d/b/a Claro Puerto Rico and Claro Enterprise Solutions, L.L.C. As of the date of this filing, LATAM’s officers and directors are: Andres Mosquera, Luis Segovia, Cori Reitman, and Arturo Pellerano.

Is the provider a foreign provider: No

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

Name: Manuel Pablo Lorenzo

Title: Manager of Security

Contact Department: U.S. Operations

Business address: 950 11th Ave S, Jacksonville Beach, Florida 32250

Telephone number: 305-975-0600

Email address: tracebackinfo@latamtelecomusa.com

Operating Company Number (OCN): 771J

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B. Provider Classification Information

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

LATAM is a gateway provider with a STIR/SHAKEN obligation, and a non-gateway intermediate provider with a STIR/SHAKEN obligation.

2. STIR/SHAKEN Implementation Status:

LATAM has fully implemented the STIR/SHAKEN authentication framework in its network in its capacity as both a gateway provider and non-gateway intermediate provider.¹

C. Certifications

1. Filling in the Robocalling Mitigation Database:

LATAM certifies its prior certification filed in the Robocall Mitigation Database (“RMD”) has not been removed by FCC action, nor has it been prohibited from filling in the RMD pursuant to a law enforcement action.

2. Enforcement Actions and Investigations:

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

D. Robocall Mitigation Plan

This section describes the specific reasonable steps that LATAM 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

As a non-gateway intermediate provider and a gateway provider, LATAM has implemented the STIR/SHAKEN authentication framework in its entire network. Specifically, the company deployed the STIR/SHAKEN framework to authenticate caller identification information for all calls it receives that use North American Numbering Plan (“NANP”) resources that pertain to the

¹ LATAM has obtained a Service Provider Code (SPC), as reflected on the iconectiv website. See <https://authenticate.iconectiv.com/authorized-service-providers-authenticate>.

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United States in the caller ID field and for which the caller identification information has not been authenticated and which it will exchange with another provider as a SIP call. Even if LATAM is only able to assign a C-level attestation to unauthenticated, foreign-originated traffic using a NANP resource, implementing the STIR/SHAKEN authentication framework in its IP network enhances the traceback capabilities of the Industry Traceback Group (ITG). Because LATAM provides attestations to foreign originated calls using NANP resources by América Móvil's foreign subsidiaries, the ITG's traceback process may be accelerated because in many instances the traceback consortium will be able to go directly to LATAM without having to conduct a traceback through each of LATAM's downstream providers.²

2. Unaltered Treatment of Header Information

Consistent with the FCC's rules for intermediate providers, LATAM 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. 47 CFR § 64.6302(a).

3. Responding to Traceback Requests

As a non-gateway intermediate provider and a gateway provider, LATAM commits to respond fully and within 24 hours to all traceback requests from the Commission, 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. 47 CFR § 64.6305(b)(2).

4. Certification of Robocall Mitigation Plans by LATAM's Foreign Affiliates

Consistent with the Commission's rules, each of the América Móvil foreign voice service providers that deliver U.S.-bound traffic to LATAM has a robocall mitigation plan in place and has also made the appropriate certification in the Commission's Robocall Mitigation Database. 47 CFR § 64.6305(g)(2).

5. Adoption of an Acceptable Use Policy and/or Anti-Fraud Policy by Affiliates

As previously indicated, LATAM is a transit provider that does not originate or terminate any traffic on its network. However, all of América Móvil non-U.S. subsidiaries 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. The non-U.S. subsidiaries make these policies available to their customers as part of their contractual arrangements. If it is detected that the customer engages in a prohibited practice, the non-U.S. subsidiaries reserve the right to pursue administrative, civil and/or criminal actions permitted under the applicable foreign law and/or the total or partial suspension or cancellation of service.

² Full traceback capabilities will be available to the ITG in instances where LATAM passes the call through an all-IP path to termination.

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6. Implementation of Know-Your-Upstream Provider Frameworks

As a non-gateway intermediate provider and a gateway provider, and consistent with the Commission's rules governing the know-your-upstream provider requirement, LATAM has taken reasonable steps to avoid carrying or processing illegal robocall traffic as part of its robocall mitigation program. 47 CFR § 64.6305(e)(2)(ii). As previously indicated, all of América Móvil non-U.S. subsidiaries 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, LATAM is able to address any illegal robocalls that might originate with an América Móvil non-U.S. subsidiary's customer.

With respect to traffic from foreign carrier customers not affiliated with América Móvil, and as of January 14, 2023, LATAM implemented a process that includes collecting information, such as:

- Article of association and/or bylaws;
- Certificate of incorporation;
- Certificate of good standing;
- Proof of address;
- ID Attorney-in-fact; and
- Taxpayer Identification Number

7. Incorporating Contractual Terms in Agreements

As a non-gateway intermediate provider and a gateway provider, LATAM includes relevant provisions in its contracts with all of its carrier customers that can reasonably be expected to significantly reduce the origination of illegal robocalls. For example, LATAM only accepts payments through electronic bank transfers, which are traceable. LATAM does not accept payment through other non-traceable and/or problematic mechanisms such as cryptocurrency, gift cards, and PayPal.

8. Monitoring of Network Traffic

LATAM's network operation center monitors network traffic 24/7/365 to ensure service quality, and to monitor for network anomalies associated with illegal robocalls. LATAM's continuous monitoring and related reporting protocols analyze network traffic to identify instances of unusual spikes and/or suspicious patterns, including high-volume inbound and outbound traffic. LATAM also validates international traffic through monitoring platforms to identify patterns of irregular activity and, if necessary, engage in mitigation and control.

9. Investigation and Mitigation of Suspicious Traffic

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

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- Once an anomalous behavior is detected, LATAM analyzes the case and interacts expeditiously with the carriers involved to prevent fraudulent activity and, if applicable, proceed to block traffic in compliance with applicable regulations.
- LATAM collaborates with other carriers expeditiously and in good faith to investigate suspicious activity.
- LATAM 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.

10. Suspending/Mitigating Illegal Traffic

When suspicious traffic has been identified and confirmed upon further investigation, the carrier customer's service will be suspended, consistent with local and federal regulations, and following LATAM's established procedures.

11. Blocking Following Commission Notification of Suspected Illegal Traffic

Consistent with the Commission's rules, LATAM is prepared to block, rather than simply effectively mitigate, identified illegal traffic when it receives actual written notice of such traffic by the Commission through its Enforcement Bureau. To comply with this requirement, the Company will block traffic that is substantially similar to the identified traffic on an ongoing basis.

12. Implementation of a Do-Not-Originate List

When it serves as a gateway provider for particular calls, LATAM, with respect to those calls, blocks any calls purporting to originate from a number on a reasonable do-not-originate list. 47 CFR § 1200(o). In particular, LATAM uses the do-not-originate list maintained by the Industry Traceback Group, which the Commission has stated is a "reasonable" DNO list.³

13. Participation in Fraud-Centric Industry Organizations and Frameworks

LATAM, as part of the América Móvil group, participates in the Fraud and Security group of the GSMA and the TM-Forum. In addition, LATAM has established a process to provide information requested by the ITG to trace the origin of the alleged illegal robocalls that transit through LATAM's Network. LATAM is also part of the América 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.

³ *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, Sixth Report and Order in CG Docket No. 17-59, 37 FCC Rcd 6865, ¶ 89 n.254 (2022).

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14. Call Analytics Systems

As noted previously in this Robocall Mitigation Plan, LATAM utilizes its own internal resources, systems, and frameworks to analyze its network for suspicious robocall traffic, and LATAM does not rely on third-party call analytics systems.⁴

Respectfully submitted,

/s/ Arturo Pellerano

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⁴ See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18, ¶ 40 n.156 (2023) (considering and rejecting a proposal to specifically require providers to use call analytics).