

ROBOCALL MITIGATION PROGRAM OF OPERBES (BESTEL)

About Us

Operbes S.A. de C.V. ("Operbes") provides voice services to enterprise and residential customers located in Mexico. The services offered by Operbes enables its Mexican customers to make voice calls destined for, and to receive voice calls originating from, businesses and residential customers located in the United States (in addition to other international destinations).

STIR/SHAKEN Implementation Obligation and Status

Operbes a foreign voice service provider that does not have a STIR/SHAKEN implementation obligation. All traffic originated by Operbes is originated using Mexico-based facilities and with Mexican telephone numbers in the caller ID field. Moreover, all voice traffic is processed using Mexico-based facilities. As a foreign voice service provider that only uses Mexican telephone numbers, Operbes is exempt from an implementation obligation because it is unable to obtain a Service Provider Code token.¹

Robocall Mitigation Measures

- As part of our onboarding process, customers must comply with the origin number identification on SIP protocol signaling before the service is released.
- For all new or renewing customers, we collect information regarding the customer's identity including name, billing address, service address, and contact information.
- Our contracts and/or terms of service with our customers requires customers to acknowledge that use of our service to originate illegal robocalls or any message in contravention of applicable laws and regulations is prohibited. Customers found to originate illegal robocalls or other unlawful traffic are subject to suspension and/or disconnection of service.
- Call detail records ("CDRs") are generated for all calls that originate on our networks. CDRs are stored for a minimum of a year to ensure they are available for future investigative request(s) and if a post-call analysis is required. CDRs are reviewed daily for detection of suspicious traffic.
- We receive traffic only from a limited number of voice providers, which currently includes only our affiliate Bestel (USA) Inc. ("Bestel USA"). Operbes and Bestel USA maintain a service agreement that governs traffic exchange and requires both parties to comply with all regulatory and legal requirements that apply to the provision of telecommunications services and to cooperate with each other in their efforts to comply with the applicable laws and regulations. Moreover, the use of services by both parties under the agreement must not be used for any unlawful purpose and altering the CPN or ANI of any U.S.-destined traffic is prohibited. To the extent we may in the future receive traffic from

¹ See 47 CFR Section 64.6304(b). Operbes previously attempted to obtain an SPC token but its request was denied due to the company's exclusive use of Mexican telephone numbers.

unaffiliated carriers, we commit to obtaining the identity and contact information of the provider and ensuring that contracts with such upstream providers (if any) contain provisions that mitigate the ability for our service to be used for the origination of robocalls.

- We analyze our network traffic in real time in order to detect malicious calls and suspicious originating traffic, in particular large volumes of calls originating from a single telephone number in a short period of time. If we detect malicious calls or suspicious traffic, the operations department is notified to investigate further and potentially suspend service to the customer. The customer is warned against further malicious and/or suspicious use of our networks. If the issue cannot be resolved or the customer does not cooperate, the customer's service may be suspended and/or disconnected. Operbes utilizes a solution from RedShift Networks to analyze network traffic.
- Our Fraud Prevention team monitors traffic on our networks 24 hours per day, 7 days per week, 365 days per year.

Trackback

- We will respond fully, within 24 hours, to call traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium.²
- We will cooperate (to the extent permitted by applicable local law) with the Federal Communications Commission, law enforcement, and the industry traceback consortium to investigate and end any illegal robocallers found to be using our service to originate calls.

Ownership and Management

- Operbes has no subsidiaries.
- Operbes's affiliate Bestel USA is a Non-Gateway Intermediate Provider to which Operbes transmits traffic for delivery to U.S.-based gateway provider(s) for routing to terminating carriers in the United States.
- Operbes is indirectly owned by Cablestar S.A. de C.V. Public shareholders of Mexico indirectly own approximately 49% of the interests in Operbes. The remaining interests in Operbes are held indirectly by Grupo Televisa, S.A.B., which itself is controlled (as defined in the Commission's rules) by Emilio Fernando Azcarraga Jean, as trustee for The Azcarraga Trust.

² Operbes commits to respond to traceback requests to the fullest extent possible within 24 hours. This 24-hour window applies within business days, pursuant to 47 C.F.R. § 64.1200(n)(1)(ii). However, if the information requested is older than 90 days, it could take Operbes between 48 hours to one week to gather the required information.