



MITIGATION PLAN NUEVATEL PCS DE BOLIVIA

According to the FCC's Robocall Mitigation Database External Filing Instructions, point ix., Nuevatel PCS de Bolivia would like to register Certification option number 3 in the FCC database/records:

- ix. Select one of the three certification options from the "Certification" section of the form. These options describe various levels of STIR/SHAKEN implementation and the steps a Voice Service Provider must take if it is performing robocall mitigation.

See Figure 10 below.

- ☐ Option 3: No STIR/SHAKEN Implementation - Performing Robocall Mitigation. The filer certifies that it commits to respond 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 originate calls, and that none of the voice traffic that originates on its network is authenticated with STIR/SHAKEN, and that all of the voice traffic that originates on its network is subject to a robocall mitigation program. The filer also certifies that the attached searchable PDF details the specific reasonable steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program, the status of its implementation of STIR/SHAKEN across its entire network, and, if applicable, the type of extension or extensions it received under 47 CFR § 64.6304.

Providing that, even though Nuevatel PCS de Bolivia (Nuevatel) does not have STIR/SHAKEN standard implemented in its network systems and platforms, its network elements allow only for originating calls based on the National Numbering Plan provided by the Bolivian Regulator (ATT - Autoridad de Regulación y Fiscalización de Telecomunicaciones y Transportes) certifying that no identity impersonation or CLI modification is allowed.

Additionally, Nuevatel's Revenue Assurance and Fraud area has a Fraud Management System (FMS) and a Revenue Assurance System (RAS), where the FMS is responsible for real-time monitoring of all outgoing and incoming, local and international, voice traffic to its network; analyzing CDRs, for this particular case, of the international outgoing traffic carried out with its Carrier dialing code and an authorized number, in order to identify unusual spikes and suspicious patterns. The FMS triggers alerts that are analyzed and validated on a daily basis by the fraud prevention team, and the RAS analyzes traffic trends with unusual volumes, average call duration and failed attempts. If anything unusual is recognized, Nuevatel could proceed with mitigation and control. Only roaming visitors Roaming in Nuevatel's network have a different identification number and are allowed to perform international calls.

Moreover, Nuevatel doesn't capture traffic towards the U.S.A. for the moment, consequently there is no risk with hubbing traffic coming from other Carriers in the form of Robocalls.

As for the commercial side, Nuevatel has adopted several usage policies in its General Terms and conditions for Postpaid and Prepaid mobile services (Términos Generales y Condiciones Servicios Móviles Postpago y Prepago), which establish specific anti-fraud prohibitions for customers using the service wrongfully or unlawfully.

For the specific case of calls destined to the U.S.A., Nuevatel is exclusively engaged in commercial relationships with legally established operators in the U.S.A.

Regards,

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Nuevatel PCS de Bolivia



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