

Broadband VI, LLC's Robocall Mitigation Plan

Broadband VI, LLC ("BBVI") has adopted this robocall mitigation plan to take measures to limit the potential for the origination of unlawful robocalls from its services and in accordance with 47 C.F.R. § 64.6305. BBVI will update this plan within ten (10) business days following the date of any material changes.

BBVI's Role(s) in the Call Chain

BBVI is a reseller of voice services it purchases from Momentum Telecom, Inc., the underlying network provider. BBVI operates as a voice service provider for purposes of the Commission's robocalling rules when it sells originating and terminating voice services to end-user customers in the U.S. Virgin Islands. BBVI does not operate as a Gateway Provider or Non-Gateway Intermediate Provider as defined by the Commission's robocalling rules.

STIR/SHAKEN Implementation Status

BBVI is a voice service provider that provides interconnected Voice over Internet Protocol ("VoIP") services to business customers. Although BBVI has direct relationships with its end-user customers, BBVI resells VoIP service obtained from a wholesale provider. BBVI does not operate its own voice switches and does not operate switches leased from another entity. Nor does BBVI control number porting or call trunking associated with calls originating from or terminating to BBVI's customers. As such, BBVI "lack[s] control over the necessary network infrastructure to implement STIR/SHAKEN" and does not have a STIR/SHAKEN implementation obligation.¹

Terms of Service and Other Robocall Mitigation Measures

BBVI's residential and commercial Terms of Service ("TOS"), which incorporates its Acceptable Use Policy, prohibit the use of BBVI's voice service "for auto-dialing, continuous or extensive call forwarding, telemarketing, or for any other use that results in ... fraud, or usage inconsistent with normal calling patterns," or "for any unlawful purpose." BBVI monitors origination traffic and investigates suspicious calling patterns that are indicative of unlawful and unwanted robocalling.

If BBVI is notified of a suspicious calling pattern, it will investigate. If it determines that the subscriber is using its services to originate unlawful calls or to violate the TOS, it may disconnect specific transmissions or uses of its services that are unlawful or prohibited. BBVI may take further action, as appropriate, including suspension or termination of the subscriber's service against any customer who continues to violate these usage policies.

¹ See *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources*, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, 3260, ¶ 40 (2020) (excluding from a STIR/SHAKEN implementation obligation those providers that lack control over the necessary network infrastructure); See *Call Authentication Trust Anchor*, Second Report and Order, 36 FCC Rcd 1859, 1868, ¶ 19 (2020).

Subscriber Vetting Process

BBVI vets the identity of its subscribers when (i) approving an application for service; (ii) entering into a contract; or (iii) granting the right to use telephone number resources. BBVI collects the customer's name and address, contact information, and, for commercial customers, jurisdiction of incorporation, federal tax ID, and the nature of the customer's business. BBVI will not provide service if a new customer's identification cannot be verified.

Upstream Provider Vetting Process

BBVI relies exclusively on its underlying wholesale provider for handling calls that originate from or terminate to BBVI's end-user customers. BBVI has ensured that its wholesale provider is listed in the Robocall Mitigation Database and has measures in place to vet the providers with which the wholesale provider exchanges voice traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

BBVI commits to respond fully, within 24 hours, to valid requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies (including the FCC), and to cooperate with such entities to investigate and address suspected unlawful robocalls originated by BBVI's wholesale provider or passed to BBVI's customers. BBVI has provided the ITG with the contact information for a dedicated traceback point of contact. BBVI will endeavor to timely assist with investigating the source of suspicious traffic.

Ownership and Management

BBVI is a majority-owned subsidiary of Liberty Mobile USVI Inc. ("Liberty Mobile USVI"). Liberty Mobile USVI is a direct, wholly owned subsidiary of Liberty Mobile Inc. Liberty Mobile Inc. and ultimately is wholly owned and controlled by Liberty Latin America Ltd. ("Liberty Latin America"), a widely held company whose shares are publicly traded on the Nasdaq (ticker symbols LILA and LILAK). Information regarding Liberty Latin America's executive team and board of directors can be found at: <https://lla.com/executive-team-and-directors>.

BBVI has no subsidiaries. Through common ownership by Liberty Latin America, BBVI has numerous affiliates, such as Liberty Communications of Puerto Rico LLC, Liberty Mobile Puerto Rico Inc., and Liberty Mobile USVI Inc. Only some of these affiliates provide voice services, and relevant Liberty entities have provided the Commission with the names of their foreign carrier affiliates.