

Liberty Mobile Puerto Rico Inc. and Liberty Mobile USVI Inc.

Robocall Mitigation Plan

Liberty Mobile Puerto Rico Inc. and Liberty Mobile USVI Inc. (together with Liberty Mobile Puerto Rico Inc., “Liberty Mobile”) have adopted this robocall mitigation plan to take measures to limit the potential for the origination of unlawful robocalls from their network and in accordance with 47 C.F.R. § 64.6305. Liberty Mobile will update this plan within ten (10) business days following the date of any material changes.

Liberty Mobile’s Role(s) in the Call Chain

Liberty Mobile operates as a voice service provider when it provides originating and terminating voice services to end-user customers in Puerto Rico and the U.S. Virgin Islands.¹ Liberty Mobile does not operate as a Gateway Provider or Non-Gateway Intermediate Provider as defined by the Commission’s rules.

STIR/SHAKEN Implementation Status

Liberty Mobile has fully implemented the STIR/SHAKEN authentication framework across its Internet Protocol (“IP”)-based network. All traffic originated on Liberty Mobile’s network is authenticated by Liberty Mobile and subject to the company’s STIR/SHAKEN call authentication protocols. All inbound traffic terminating on Liberty Mobile’s network is verified by Liberty Mobile before terminating with an end user. To the extent that a terminating carrier does not accept traffic in IP, Liberty converts such traffic to TDM before handing the call off to that carrier.

Subscriber Vetting

Liberty Mobile vets the identity of its subscribers when (i) approving an application for service; (ii) provisioning of network connectivity; (iii) entering into a contract; or (iv) granting the right to use telephone number resources. Liberty Mobile 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. Liberty Mobile will not provide service if a new customer’s identification cannot be verified.

Upstream Provider Vetting

Liberty Mobile vets the identities of its upstream providers before accepting their voice traffic. Before accepting traffic from an upstream provider, and as part of the company’s contracting practice, Liberty Mobile obtains information on the provider’s physical address, contact person, state or country of incorporation, federal tax ID (if applicable), and the nature of their business. Liberty Mobile also only exchanges voice traffic with a limited set of providers.

¹ Liberty Mobile provides both mobile and fixed services in Puerto Rico, and mobile services in the U.S. Virgin Islands.

Terms of Service and Other Robocall Mitigation Measures

Liberty Mobile's residential and commercial terms of service ("TOS"), which incorporates its Acceptable Use Policy, prohibit the use of Liberty Mobile's voice service "for auto-dialing, continuous or extensive call forwarding, telemarketing, or for any other use that results in harm to the Company's network, fraud, or usage inconsistent with normal calling patterns," or "for any unlawful purpose." Liberty Mobile monitors voice traffic for suspicious uses and traffic patterns.

If Liberty Mobile is notified of a suspicious traffic pattern, Liberty Mobile investigates. If it determines that the subscriber is using the Liberty Mobile network to originate unlawful calls or to violate the TOS, it may disconnect specific customers or uses of its services that are unlawful or prohibited. Liberty Mobile may take further action, as appropriate, including suspension or termination of service for any customer who continues to violate these usage policies.

Liberty Mobile automatically provides free essential security features to its wireless customers, including network-based automatic fraud call blocking and suspected spam risk alerts. Liberty Mobile automatically blocks fraud calls in the network with "Liberty Call Defense"—before they ring on the customer's phone or voicemail. Additionally, wireless customers, using the free Call Defense app, can customize their robocall protection and create their own personal block list. Customers on certain Liberty Mobile wireless plans can receive enhanced Caller ID and additional advanced security features of the Mobile Security app, including Identity Monitoring, Safe Browsing, and Public Wi-Fi Protection at no extra charge.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Liberty Mobile 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 or passed to Liberty Mobile by Liberty Mobile's customers. Liberty Mobile, through its affiliate Liberty Communications of Puerto Rico LLC, has provided the ITG with contact information for a dedicated traceback point of contact. Liberty Mobile will endeavor to timely assist with investigating the source of suspicious traffic.

Ownership and Management

Each of Liberty Mobile Puerto Rico Inc. and Liberty Mobile USVI Inc. are direct, wholly owned subsidiaries of Liberty Mobile Inc. Liberty Mobile Inc. is ultimately 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>.

Liberty Mobile Puerto Rico Inc. has the following wholly-owned subsidiaries: Emerald Mobile HoldCo 1 LLC, Emerald Mobile HoldCo 2 LLC, Emerald Mobile HoldCo 3 LLC, Emerald Mobile HoldCo 4 LLC, Emerald Wave 1 LLC, Emerald Wave 2 LLC, Emerald Wave 3 LLC, Emerald Wave Holdco LLC, Emerald Mobile Network LLC, and Emerald Mobile Network2 LLC. Liberty Mobile USVI Inc.'s only subsidiary is Broadband VI, LLC. Through common ownership by Liberty Latin America, Liberty Mobile has many affiliates, such as Liberty Communications of

Puerto Rico LLC, Liberty Mobile Puerto Rico Inc., and Broadband VI, LLC. Only some of these affiliates provide voice services, and relevant Liberty entities have provided the Commission with the names of their foreign carrier affiliates.