

Cable & Wireless Communications, LLC

ROBOCALL MITIGATION PLAN

Cable & Wireless Communications, LLC, on behalf of itself and its affiliates Cable & Wireless (Barbados) Limited; Cable & Wireless Jamaica Limited; Columbus Communications Jamaica Ltd.; Bahamas Telecommunications Company Ltd.; United Telecommunications Services NV; Cable & Wireless Panama, S.A.; and Antelecom N.V. (together, “C&W”) has adopted this robocall mitigation plan to take measures to limit the potential for the transmission of unlawful robocalls from its network and in accordance with 47 C.F.R. § 64.6305. C&W will update this plan within ten (10) business days following the date of any changes.

C&W’s Role in the Call Chain

The C&W affiliates are licensed telecommunications operators that provide voice service to end users and other providers exclusively outside the United States. C&W’s customers are able to use its voice services to place calls destined for end users located in the United States and other countries.

STIR/SHAKEN Implementation Obligation and Status

The C&W affiliates are foreign voice service providers that do not have a STIR/SHAKEN implementation obligation. All traffic originated by the C&W affiliates is originated using non-U.S.-based facilities. Moreover, all telephone numbers assigned to C&W’s customers, and used in the caller ID field for U.S.-bound voice traffic, are allocated pursuant to non-U.S. numbering plans. As a foreign voice service provider that only uses foreign telephone numbers, the C&W affiliates are exempt from an implementation obligation because they are unable to obtain Service Provider Code token(s).¹ However, if a C&W affiliate receives SIP calls destined for the United States that have been authenticated with STIR/SHAKEN, they pass any identity header to the terminating voice service provider or subsequent intermediate provider in the call path.

Subscriber Vetting

C&W vets the identity of subscribers and interconnection partners when (i) approving an application for service; (ii) provisioning of network connectivity; (iii) entering into a contract agreement; or (iv) granting the right-to-use any U.S. telephone number resources. C&W collects the customer’s legal name and address, contact information, and, for commercial customers, other relevant information that can be used to verify the nature of the customer’s business.

Upstream Provider Vetting

C&W vets the identities of its upstream providers before accepting their voice traffic. C&W’s policy is to not provide service as an intermediate provider to deliver traffic to the United States or to a U.S. service provider unless it is able to verify the identity of the carrier or VoIP service provider as a legitimate business operation. Before accepting traffic from an upstream provider, C&W obtains information on the provider’s physical address, contact person, state or country of

¹ See 47 CFR Section 64.6304(b).

incorporation, the nature of their business, and whether the upstream provider is identified in the FCC's Robocall Mitigation Database (to the extent required). Additionally, C&W monitors incoming traffic from upstream providers for signs of potentially illegal robocalls.

Telephone Number Validation

In the event that C&W becomes aware that a U.S. telephone number is associated with a call that has been originated outside the U.S. and delivered to C&W for transmission to another service provider for U.S. termination, C&W will seek to confirm the originating caller's right to use such telephone number.

Terms of Service and Other Robocall Mitigation Measures

C&W uses best efforts to monitor origination and intermediate traffic and investigates calling patterns that are indicative of caller ID spoofing or voluminous unwanted robocalling. Such indicia may include, but is not limited to:

- reputation score of the calling party ANI or Dialed Number Identification Service (DNIS) based upon data from LCPR's vendors, other carriers, regulators, and in-network analytics
- excessive short duration calls
- being the subject of an ITG, law enforcement or government inquiry, or consumer complaints
- determination that the originating caller does not own or is not authorized to use the Caller ID number, or that the Caller ID name does not match the customer's corporate name, trademark, or d/b/a name; or
- calls that stop attempting to connect after a single ring.

C&W can and will take appropriate action which may include termination of service against customers and interconnection partners that fail to remedy practices that result in the transmission of significant volumes of unwanted robocalls destined for the United States. C&W may terminate services to residential or business customers for fraud or annoying, offensive or abusive calls under its General Terms and Conditions, and for breaches of the company's Acceptable Use Policy embedded in its business-to-business contracts. C&W does not use any third-party vendors for call analytics.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Subject to the limitations of applicable law in its operating jurisdictions, C&W commits to respond fully, within 24 hours, to valid requests made by the Industry Traceback Group (ITG), U.S. law enforcement authorities, and U.S. government agencies (including the FCC), and to cooperate with such entities to investigate and address suspected unlawful robocalls originated or passed to C&W by C&W's customers.

Ownership and Management

The C&W affiliates are wholly-owned subsidiaries of Cable & Wireless Communications Limited, which in turn 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>.

Through common ownership by Liberty Latin America, C&W has numerous affiliates, only some of which provide voice services. The following affiliates of C&W are voice service providers in the United States: Liberty Communications of Puerto Rico, LLC; Liberty Mobile Puerto Rico Inc.; and Liberty Mobile USVI Inc.