

Robocall Mitigation Plan

Business Information

Axtel S.A.B. de C.V.
Av. Munich 175 Col. Cuauhtémoc San Nicolas de los Garza
Nueve León, Mexico 66450

Contact Information

Adrian Mercado Gracia
Regulatory Manager
52 55 88 51 82 37
amercadog@axtel.com.mx

With copy to:
Ricardo Garcia de Quevedo Ponce
Legal Corporate and Regulatory Director
52 55 8851 8215
rquevedo@axtel.com.mx

Overview

In the Commission's recent release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

Axtel S.A.B. de C.V. ("Axtel") is a foreign voice service provider dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. This document delineates Axtel's RMP.

Know Your Customer

A subscriber is an entity that has a business relationship with Axtel in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

New Subscribers

All new subscribers go through identity verification process. The process is developed to ensure the authenticity of a new subscriber. These include but are not limited to: name, email address, credit card information and contact phone number, (Tax ID, Certificate of Incorporation, Legal representative documentation, Power of attorney).

These identity markers are validated for accuracy. All new subscriber activity is monitored as further explained below.

Existing Subscribers

Axtel may require updates of subscribers' information on all their orders as needed.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51, Axtel provides the following information concerning its upstream voice service carriers.

Axtel has four upstream providers which receive Axtel's voice traffic to end it in the US:

1. TATA
Business Name: Tata Communications (Canada) LTD.
Address:
1555 CARRIE-DERICK
MONTREAL, QUEBEC H3C 6W2
CANADA
Contact Person: Carlos Vanegas
Contact Person's email address: Carlos.Vanegas@tatacommunications.com
2. Latino
Business Name: Latino Communications Corporation
Address:
5215 N. O'CONNOR BLVD SUITE 1725
IRVING, TX 75039 USA
Contact Person Perla Cantú:
Contact Person's email address pcantu@latcomm.net
3. Verizon
Business Name: MCI International LLC
Address
P.O. BOX 15043
ALBANY NY 12212-5043
USA
Contact Person: Guillermo Avalos Ochoa
Contact Person's email address guillermo.avalos@verizon.com
4. AT&T

Business Name: AT&T Corp.
Address
PO Box 1995 Room N460
412 Mt Kemble Ave
Morristown, NJ, USA
Contact Person: Consuelo Pardo
consuelo.pardo@intl.att.com

Axtel has master service agreements with its upstream providers and has received assurances in writing from their officials that they have, and will continue to, abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when receiving Axtel's voice traffic or providing voice traffic to Axtel. Axtel and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy

Axtel maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use Axtel's network. Among other things, this AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using Axtel's service to engage in or in connection with fraudulent activities.

Axtel's contractual terms with subscribers specify that Axtel may take action up to suspension or termination of service for violation of the AUP.

Monitor Traffic with Analytics

Dynamic Traffic Analysis identifies behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, our risk prevention team is alerted which follows the defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records against expected trends;
- checking recent and past account activity;
- investigating if our monitoring system issue generates the strange behavior;

- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Axtel follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations from the FCC, *the Instituto Federal de Telecomunicaciones*, law enforcement agencies and, when appropriate, other service providers. To allow for timely and comprehensive responses, Axtel will devote reasonable resources to provide prompt and complete resources to traceback requests.

Axtel will investigate suspicious activity found by its monitoring systems or reported to Axtel by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Axtel contacting a subscriber to correct improper use of the platform, or, if the subscriber does not respond or comply, to block their use of the platform.

Axtel uses a system called Protector. When the threshold is exceeded, the calls are either blocked automatically, or an immediate alert is sent to notify Axtel of suspicious traffic. Protector also provides notice regarding the blocking due to risk or anomalous traffic.

For all new and renegotiated Axtel contracts governing the transport of voice calls, Axtel will use best efforts to contractually require Axtel's subscribers to cooperate in traceback investigations by identifying the upstream providers from which the suspected illegal robocall entered our network.

Blocking

Axtel has mechanisms to block suspicious calls using internal analytics. If Axtel's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Axtel will take appropriate action which may include suspending or terminating the subscriber's use of Axtel's network.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Axtel will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

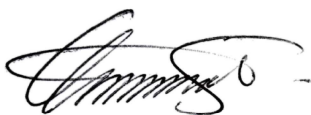
In the event of any material change to this plan, Axtel will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Adrian Mercado Gracia

I, Adrian Mercado Gracia, Regulatory Manager of Axtel, do hereby certify, under penalty of perjury, the following:

- (1) Axtel, by virtue of its status as a "pure reseller" does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- (2) Axtel 's Business name and primary address are as follows:

Axtel S.A.B. de C.V.
Av. Munich 175 Col. Cuauhtémoc San Nicolas de los Garza
Nueve León, Mexico 66450
- (3) Axtel has the following business name in use: Alestra and Axnet which are used by Axtel S.A.B. de C.V.
- (4) Axtel had previously used the following legal business name: Alestra S. de R.L. de C.V.
- (5) The following entity owns more than 10% of Axtel and is its parent company:
CONTROLADORA AXTEL, S.A.B. DE C.V.
- (6) The following person is Axtel's CEO: Armando de la Peña.
- (7) None of the persons/entities in items 5 – 6 above have had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (8) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (9) Axtel's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (10) Axtel has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (11) Axtel is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (12) Axtel is not required to have, and does not have an operating company number.



Adrian Mercado Gracia