

Liberty Communications of Puerto Rico LLC

ROBOCALL MITIGATION PLAN

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

LCPR’s Role(s) in the Call Chain

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

STIR/SHAKEN Implementation Status

LCPR has implemented STIR/SHAKEN the call authentication on its entire IP network. All SIP calls that are terminated with or passed to another U.S. service provider in SIP carry the authentication information.¹ All inbound traffic terminating on LCPR’s network is verified by LCPR before terminating with an end user. To the extent that a terminating carrier does not accept traffic in IP, LCPR converts such traffic to TDM before handing the call off to that carrier.

Subscriber Vetting

LCPR provides facilities-based wireline service to a customer’s physical premises, which provides an additional means of vetting its subscriber’s location. LCPR vets the identity of 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. LCPR collects the customer’s name and address, physical location, contact information, and, for commercial customers, jurisdiction of incorporation, federal tax ID, and the nature of the customer’s business. LCPR will not provide service if a customer’s identification cannot be verified.

Upstream Provider Vetting

LCPR vets the identities of upstream SIP voice providers before accepting their voice traffic. Before accepting traffic from an upstream provider, and as part of the company’s contracting practice, LCPR 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. LCPR also only exchanges voice traffic with a limited set of providers.

¹ Fewer than 300 LCPR customers still receive calls that are ultimately converted to TDM format. LCPR verifies those calls under STIR/SHAKEN in LCPR’s core network, and then customer premise equipment converts them to TDM.

Terms of Service and Other Robocall Mitigation Measures

LCPR's residential and commercial Terms of Service ("TOS"), which incorporated its Acceptable Use Policy, prohibit the use of LCPR'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." LCPR monitors voice traffic for suspicious uses and traffic patterns.

If LCPR is notified of a suspicious calling pattern, it will investigate. If it determines that the subscriber is using its network to originate unlawful calls or to violate the TOS, it may disconnect specific transmissions or uses of its services that are unlawful or prohibited. LCPR 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.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

LCPR 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 LCPR by LCPR's customers. LCPR has provided the ITG with contact information for a dedicated traceback point of contact. LCPR will endeavor to timely assist with investigating the source of suspicious traffic.

Ownership and Management

LCPR is jointly owned by LCPR Ventures LLC and LCPR Cayman Holding Inc., which are 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 Ltd.'s executive team and board of directors can be found at: <https://lla.com/executive-team-and-directors>.

The following recently-created entities are wholly-owned subsidiaries of LCPR: Emerald Network HoldCo 1 LLC, Emerald Network HoldCo 2 LLC, Emerald Network HoldCo 3 LLC, Emerald Network 1 LLC, Emerald Network 2 LLC, and Emerald Network 3 LLC. Through common ownership by Liberty Latin America, LCPR has numerous affiliates, such as Liberty Mobile USVI Inc., 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.