

ROBOCALL MITIGATION PROGRAM OF BESTEL (USA), INC.

About Us

Bestel (USA), Inc. (“Bestel USA”) handles voice and data traffic received from foreign voice service providers, including its foreign affiliate Operbes S.A. de C.V. (“Operbes”), for transmission to other intermediate providers or terminating carriers in the United States. Bestel USA does not itself originate or terminate any voice traffic or maintain any voice equipment or facilities in the United States that are capable of processing voice calls.

STIR/SHAKEN Implementation Obligation and Status

Bestel USA is a Non-Gateway Intermediate Provider that does not have a STIR/SHAKEN implementation obligation.¹ All switching of voice traffic is performed in Mexico by Mexican carriers (including Operbes) using Mexico-based facilities and with Mexican telephone numbers in the caller ID field. Because Bestel USA does not receive unauthenticated SIP calls directly from any originating voice service provider in the United States, Bestel USA does not have an obligation to implement the STIR/SHAKEN Framework.²

Moreover, Bestel USA also is exempt from an implementation obligation because the company “lack[s] control over the necessary network infrastructure to implement STIR/SHAKEN.”³ Bestel USA has no access to the underlying infrastructure involved in the routing of voice calls received from Operbes or other providers.

Robocall Mitigation Measures

- Our contracts and/or terms of service with our customers requires customers to acknowledge that use of our service to transmit illegal robocalls or any message in contravention of applicable laws and regulations is prohibited. Customers found to transmit illegal robocalls or other unlawful traffic are subject to suspension and/or disconnection of service.
- Call detail records (“CDRs”) are generated for all calls that transit on our networks. CDRs are generated on voice equipment located in Mexico and are maintained by Bestel USA’s

¹ Bestel USA is not a Gateway Provider or a Voice Service Provider as defined by the Commission’s rules. Bestel USA also is not a foreign voice service provider as defined in the Commission’s rules because it is not capable of originating or terminating voice services to end-users.

² See *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97, FCC 23-18, ¶ 17 (Mar. 17, 2023) (adopting a mandatory authentication obligation only for the first intermediate provider in the path of a SIP call to authenticate unauthenticated caller ID information); 47 C.F.R. § 64.6302(d) (requiring authentication by an Non-Gateway Intermediate Provider “for all calls it receives directly from an originating provider and for which the caller identification information has not been authenticated and which it will exchange with another provider as a SIP call, unless that non-gateway intermediate provider is subject to an applicable extension in § 64.6304”).

³ 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, ¶ 40 (2020) (excluding from a STIR/SHAKEN implementation obligation those providers that lack control over the necessary network infrastructure); *Call Authentication Trust Anchor*, Second Report and Order, 36 FCC Rcd 1859, ¶ 19 (2020). See also 47 C.F.R. § 64.6305(d)(2)(i).

affiliate Operbes. CDRs are stored for a minimum of a year to ensure they are available for future investigative request(s) and if a post-call analysis is required. CDRs are reviewed daily for detection of suspicious traffic.

- We receive traffic only from a limited number of voice providers, which currently includes only our affiliate Operbes. Operbes and Bestel USA maintain a service agreement that governs traffic exchange and requires both parties to comply with all regulatory and legal requirements that apply to the provision of telecommunications services and to cooperate with each other in their efforts to comply with the applicable laws and regulations. Moreover, the use of services by both parties under the agreement must not be used for any unlawful purpose and altering the CPN or ANI of any U.S.-destined traffic is prohibited. To the extent we may in the future receive traffic from unaffiliated carriers, we commit to obtaining the identity and contact information of the provider and ensuring that the provider is identified in the Robocall Mitigation Database to the extent required by the Commission's rules.
- We analyze our network traffic in real time in order to detect malicious calls and suspicious originating traffic, in particular large volumes of calls originating from a single telephone number in a short period of time. If we detect malicious calls or suspicious traffic, the operations department is notified to investigate further and potentially suspend service to the customer. The customer is warned against further malicious and/or suspicious use of our networks. If the issue cannot be resolved or the customer does not cooperate, the customer's service may be suspended and/or disconnected. Bestel USA utilizes a solution from RedShift Networks to analyze network traffic.
- Our Fraud Prevention team monitors traffic on our networks 24 hours per day, 7 days per week, 365 days per year.

Trackback

- We will respond fully, within 24 hours, to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium.⁴
- We will cooperate with the Federal Communications Commission, law enforcement, and the industry traceback consortium to investigate and end any illegal robocallers found to be using our service to carry or process.

Ownership and Management

- Bestel USA has no subsidiaries.
- Bestel USA's affiliate Operbes is a foreign voice service provider that offers voice services to end-users in Mexico using Mexican telephone numbers.

⁴ Bestel USA will respond to traceback requests to the fullest extent possible within 24 hours. This 24-hour window applies within business days, pursuant to 47 C.F.R. § 64.1200(n)(1)(ii). However, if the information requested is older than 90 days, it could take Bestel USA between 48 hours to one week to gather the required information.

- Bestel USA is directly owned by Cablestar S.A. de C.V. Public shareholders of Mexico indirectly own approximately 49% of the interests in Bestel USA. The remaining interests in Bestel USA are held indirectly by Grupo Televisa, S.A.B., which itself is controlled (as defined in the Commission's rules) by Emilio Fernando Azcarraga Jean, as trustee for The Azcarraga Trust.