



Robocall Mitigation Program Description

As required by the TRACED Act and subsequent FCC orders.

Date: April 1st, 2024.

EXECUTIVE SUMMARY:

LATINATEL S.A. applies a set of methods that have proven highly effective in identifying and blocking robocalls, and can “reasonably be expected to significantly reduce the origination of illegal robocalls” as required by the FCC.

LATINATEL S.A. is one of the fastest growing companies in international voice services. With almost two decades of experience and offices in Montevideo (Uruguay), and Buenos Aires (Argentina), LATINATEL has direct interconnections with over 160 carriers worldwide. LATINATEL has built an exceptional team with proven track records in fast-growing high-technology companies and in the communications industry. LATINATEL is focused on enhancing personalized attention with its customers providing unique agility to attend their needs. LATINATEL combines state-of-the-art network management technology with around-the-clock dedicated staff to ensure the highest quality of efficient service to customers worldwide.

PROGRAM DESCRIPTION:

LATINATEL S.A. does a **case-by-case routing**, it does not provide an A-to-Z offer. So in case a certain customer wants to send traffic via us to the U.S., we perform:

A **risk evaluation** of new customers that want to send traffic to the U.S. restricting service to those that have their own final customer base, limiting the number of concurrent calls they can place, and the calling telephone number is assigned by the provider;

And every customer that wants to buy U.S. termination must fully complete the **Know-Your-Customer file**, so that we can examine customer’s legitimacy such as references, regulatory filings, business purpose, financial reputation, etc.

Besides that we have in place:

Blacklists to mitigate robocalls with specific attributes, including calling phone numbers or prefixes, and calling locations that have been identified as robocallers;



Reputation lookup on calling numbers at origination for robocall mitigation; and

Call Volume limitations by simultaneous calls and calls-per-second programmed in our switch MERA [™].

And we perform:

Dynamic **traffic analysis** by our NOC that compares cumulative call count by source within a temporal window with thresholds that trigger a response to a robocalling event. These thresholds are based upon call history and are updated routinely. We have many automated alarms by our switch MERA [™] for suspicious call activity that trigger an investigation.

Call Detail Record (CDR), monitoring, analysis and review to look for unexpected high call volume, short call duration, call hang ups by called party, etc. We have a lot of automated alarms by our StarBI [™] system for suspicious call activity that trigger an investigation.

As a daily working methodology, we do:

A routinely **exchange of information** with selected partners on traffic flows, suspicious CDRs, new customers reputation, etc.

Besides these methods, LATINATEL S.A. is fully committed to cooperate with traceback as required by the FCC, responding to vendors, authorities, lawyers, etc. requirements **as soon as possible**, providing **all the information** asked.

This Program is a **compromise** that involves all LATINATEL S.A.'s organization, including Sales, Network Operations and Information Systems, and our systems vendors such as StarBI and Netflix Solutions.

Gabriel BORRAS
President
LATINATEL S.A.