

Robocall Mitigation Plan AMX PARAGUAY S.A. (revised)

Overview

This document constitutes AMX PARAGUAY S.A.'s Robocall Mitigation Plan. AMX PARAGUAY S.A. is a Paraguayan wireless telecommunications company owned by América Móvil. A Robocall Mitigation Plan will be deemed sufficient by the Federal Communications Commission (FCC), if the voice service provider:

- includes detailed practices that can reasonably be expected to significantly reduce the origination of illegal robocalls,
- complies with the practices it describes, and
- participates in industry traceback efforts.

A. General/Contact Information

Business name: AMX PARAGUAY S.A.

Primary Address: Mcal. Lopez Nro.1730 Asunción, Paraguay

Other business name(s) in use: Claro Paraguay

All business names previously used: None

Information on the provider's principals, affiliates, subsidiaries, and parent companies:

- The company is a wholly owned subsidiary of América Móvil, a Mexican holding company. The company's affiliates in the United States include LATAM Telecommunications, LLC, Puerto Rico Telephone Company, Inc. d/b/a Claro Puerto Rico, and Claro Enterprise Solutions, L.L.C. As of the date of this filing, the company's directors are Julio Porras (CEO), Eugenio Chacon (CFO), Héctor Blanco (Commercial Director) and Alfredo Alcaraz (Country Director - Paraguay).

Is the provider a foreign provider: Yes

Name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues:

Name: Pamela Gabosi

Title: Jefe de Roaming e Interconexión

GCIA.NEG Y FACIL.MAYORIST - ABASTECIMIENTO Y DISTRIBUCIÓN

Business Address: Avenida de Mayo 878, C1084AAQ, Ciudad de Buenos Aires, Argentina.

Telephone number: +5491154548542

Email address: PGABOSI@CLARO.COM.AR

Operating Company Number (OCN): Given its status as a foreign voice service provider, AMX PARAGUAY S.A. does not have an OCN.

B. Provider Classification Information

1. Role the provider is playing in the call chain: AMX PARAGUAY S.A. is a foreign provider.
2. STIR/SHAKEN Implementation Status: Not applicable because AMX PARAGUAY S.A. is a foreign provider.

C. Certifications

1. Filling in the Robocalling Mitigation Database:

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AMX PARAGUAY S.A. certifies its prior certification filed in the Robocall Mitigation Database (“RMD”) has not been removed by FCC action, nor has it been prohibited from filing in the RMD pursuant to a law enforcement action.

2. Enforcement Actions and Investigations:

AMX PARAGUAY S.A. is not subject to a Federal Communications Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing. Furthermore, neither AMX PARAGUAY S.A. nor any entity with which AMX PARAGUAY S.A. shares common ownership, management, directors, or control, has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to AMX PARAGUAY S.A. transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description in the prior two years.

3. Responses to Traceback Requests:

Consistent with the domestic laws and regulations to which it is subject in its country of operation, AMX PARAGUAY S.A. will seek to respond to all traceback request from the FCC, the FCC’s designated traceback consortium, and law enforcement agencies within 24 hours.

Robocall Mitigation Plan

The plan below describes how AMX PARAGUAY S.A. is meeting its obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls.

1. Objective and Scope

The objective is to define AMX PARAGUAY S.A. Robocall Mitigation Plan. AMX PARAGUAY S.A. commitment is to prevent, as much as reasonably possible, illegal calls (robocalls) from originating in its network, as well as monitoring incoming calls to its network.

2. Use Policy

AMX PARAGUAY S.A. has adopted Acceptable Use Policy (Fair Use Policy for Voice and SMS services) that describes prohibited practices and the corresponding consequences of engaging in those practices. The company makes the Policies available on its website to its customers and subscribers. In accordance with the Policies, customers and subscribers may not use the AMX PARAGUAY S.A. network, products and/or services to engage in, encourage or promote, including, but not limited to, the use of the AMX PARAGUAY S.A. platform for dialing, robocalls, telemarketing, high volume fax, text messaging, voicemail transmission or any other transmission that violates any statute or regulation in the countries where the company operates. The Policies specify that customer access to the AMX PARAGUAY S.A. network, products and/or services may be restricted for violation of the Policies, always in compliance with the applicable regulations.

In the service contract that the client signs with AMX PARAGUAY S.A., obligations are established for the client to use the contracted service only for their personal use, and not to use it at any time to carry out the prohibited practices defined in the contract.

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Under the service contract, a prohibited practice includes several activities, including: (i) using the service as call center lines for telephone contact campaigns and/or for carrying out and sending advertising, alerts, etc., without prior, express and written authorization from AMX;–(ii) using the service as a gateway sending bypass type communications; (iii) using the service for spam-type messages; (iv) using the service for fraudulent, criminal or illegal purposes.

If it is detected that the customer engages in any of the aforementioned prohibited practices, AMX PARAGUAY S.A. reserves the right to pursue the administrative, civil and/or criminal actions that correspond permitted under the law; including, restrict totally or partially, temporarily or permanently the provision of services, always in compliance with the applicable laws and regulations.

3. Know your Customer Protocols

AMX PARAGUAY S.A. has a vetting process of its clients and subscribers that includes collecting information, such as:

For Residential/Consumer Services: AMX PARAGUAY S.A., according to the identity validation process adopted by AMX requires customers to provide their full legal name and identification number (as reflected on government identification), residential address, contact phone number(s) and email address (eventually). New or renewing customers are also required to affirmatively acknowledge and accept AMX PARAGUAY S.A. terms and conditions associated with use of the service.

For Business Services: AMX PARAGUAY S.A. carries out due diligence on new / renewed clients, such as a credit check and the Certificate of Incorporation and/or the company's tax identification number. On certain occasions the physical business address, the company website, and a valid email address that matches the company domain are verified.

AMX PARAGUAY S.A. may consider whether any enterprise customer has been the subject of: (1) any formal written request from a government agency, subpoena, civil investigative demand, or other complaint; or (2) any lawsuit filed by a regulatory agency, or any other law enforcement action by any other state or federal agency (this review could also include any trade or fictitious names/aliases under which the company operates).

4. Review Existing Contractual Terms and Amend as Appropriate

AMX PARAGUAY S.A. includes relevant provisions in its contracts with customers and subscribers that can reasonably be expected to significantly reduce the origination of illegal robocalls. For example, AMX PARAGUAY S.A. includes the following types of provisions:

Payment Terms: AMX PARAGUAY S.A. payments through verifiable methods, including checks, debit cards, credit cards, electronic bank transfers, not those that are not allowed by current local legislation. In accordance with tax law, AMX PARAGUAY S.A. limits the acceptance of cash payment by the allowed amount.

Contractual Provisions: AMX PARAGUAY S.A. service contracts (particularly for enterprise customers) include provisions that: (a) require the lawful use of the service; (b) prohibit number spoofing; (c) require cooperation with law enforcement requests; and (d) enable AMX PARAGUAY S.A. to restrict service for customers originating illegal robocalls, or otherwise using the services unlawfully.

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5. Monitoring

AMX PARAGUAY S.A.'s network operation center monitors network traffic to assure the service and quality. This is performed on a 24/7 basis.

AMX PARAGUAY S.A. has a continuous monitoring and related reporting protocol to analyze network traffic, such as inbound and outbound high-volume traffic in order to identify unusual spikes and suspicious patterns. AMX PARAGUAY S.A. also validates international traffic through monitoring platforms to identify patterns of irregular activity and, if necessary, engage in mitigation and control.

6. Investigating Suspicious Traffic

AMX PARAGUAY S.A. has a multidisciplinary group that is dedicated to collaborate in case an alarm is triggered or in case of a specific request.

AMX PARAGUAY S.A. takes the following steps once it has identified suspicious traffic:

- a) Once an anomalous behavior is detected, the customer profile is analyzed with personnel trained in the subject.
- b) If company personnel is unable to determine the legitimacy of the traffic, the client may be contacted in order to carry out the corresponding verifications and a further investigation is carried out.
- c) If company personnel is still unable to determine the legitimacy of the traffic, the company proceeds to restrict service, always in compliance with the applicable regulations.

AMX PARAGUAY S.A. collaborates with other carriers expeditiously and in good faith on any investigation of suspicious activity.

AMX PARAGUAY S.A. cooperates with industry groups to share best practices and fraud scenarios and discuss solutions that are reasonably designed to minimize prevent illegal, abusive, or irresponsible behavior, including, illegal robocalls. For instance, AMX PARAGUAY S.A. collaborates with the Fraud Security Group of the GSMA.

Lastly, AMX PARAGUAY S.A. is part of the America Móvil group, which is constantly sharing the experiences of each subsidiary with respect to fraudulent activities -- including illegal robocalls -- as well as best practices to quickly detect and prevent such practices. This permits the subsidiaries to benefit from each other's experiences and solutions.

7. Suspending/Mitigating Illegal Traffic

When suspicious traffic has been identified and verified with further investigation, the client or subscriber's service is immediately restricted, according to the local requirements regulations.

8. Participation in fraud-centric industry organizations

Currently AMX subsidiaries are members of the Fraud and Security group of the GSMA and the TM-Forum.

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9. U.S.-bound Voice Traffic

AMX PARAGUAY S.A. traffic originating on its network enters the USA through intermediate operators which are listed on the FCC's Robocall Mitigation Database as having either deployed the STIR/SHAKEN solution or having an appropriate robocall mitigation plan in place.

10. Call Analytics Systems

AMX PARAGUAY S.A. utilizes its own internal resources, systems, and frameworks to analyze its network for suspicious robocall traffic and does not rely on third-party call analytics systems.

11. Glossary

FCC	U.S. Federal Communications Commission
AMX PARAGUAY S.A.	América Móvil subsidiary