

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Qué Tal Mobile, LLC

Provider Information

Legal Business Name: Qué Tal Mobile, LLC

State of Formation: Colorado

Provider Type: Mobile Virtual Network Operator (MVNO)

Date of This Filing: February 27, 2026

Regulatory Contact: Aaron Bell, Chief Operating Officer

Contact Email: regulatory@quetalmobile.com

Contact Phone: 720-892-0010

I. INTRODUCTION AND COMPANY OVERVIEW

Qué Tal Mobile, LLC (“Qué Tal Mobile” or “the Company”) is a Colorado-based Mobile Virtual Network Operator (MVNO) providing wireless voice and data services to end-user subscribers, with a primary focus on the U.S. Latino market. The Company resells voice services obtained through a Mobile Network Enabler (MVNE) that provides access to the underlying networks of one or more licensed Mobile Network Operators (MNOs), including facilities-based carriers operating under agreements with the Company.

Qué Tal Mobile does not own, operate, or control the network infrastructure over which its subscribers' voice calls are transmitted. As such, the Company does not have access to or control over the session border controllers, signaling systems, or IP network elements necessary to implement STIR/SHAKEN caller ID authentication directly. STIR/SHAKEN implementation is performed by the Company's upstream network provider(s).

This Robocall Mitigation Program Description is submitted pursuant to 47 CFR § 64.6305 and the FCC's Sixth Caller ID Authentication Report and Order (FCC 23-18) and related orders. It describes the specific, reasonable steps Qué Tal Mobile has taken and will continue to take to prevent the origination of illegal robocall traffic on its network.

II. BASIS FOR NO STIR/SHAKEN IMPLEMENTATION OBLIGATION

Qué Tal Mobile certifies that it has not implemented the STIR/SHAKEN authentication framework on any portion of its network, consistent with 47 CFR § 64.6301(b), because it lacks control over the network infrastructure necessary to do so.

Applicable Rule: 47 CFR § 64.6301(b) — Voice service providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN are not required to implement

STIR/SHAKEN, provided they implement a robocall mitigation program. Qué Tal Mobile, LLC is an MVNO that resells voice services provided entirely over the network infrastructure of its upstream MVNE and underlying MNO(s). The Company has no access to or control over the IP infrastructure, SBCs, or signaling systems required for STIR/SHAKEN attestation. STIR/SHAKEN is implemented by the upstream carrier(s) providing the underlying network services.

III. ROBOCALL MITIGATION PROGRAM

Although Qué Tal Mobile does not implement STIR/SHAKEN directly, it has established the following affirmative measures to prevent illegal robocall traffic from originating on its network or through its service:

A. Know-Your-Customer (KYC) and Customer Onboarding Controls

Qué Tal Mobile requires all new and renewing customers to provide valid government-issued identification as part of the subscriber activation process. The Company verifies subscriber identity in compliance with applicable wireless carrier requirements and FCC rules. The Company does not activate service for anonymous or unverified customers. Activation processes are designed to identify and reject high-risk accounts, including those with indicators of potential robocall abuse such as bulk activations, suspicious usage patterns, or requests for large quantities of numbers.

B. Contractual Prohibitions on Illegal Robocalling

Qué Tal Mobile's subscriber terms of service expressly prohibit the use of the Company's services to transmit illegal robocalls, place calls in violation of the Telephone Consumer Protection Act (TCPA), or engage in caller ID spoofing in violation of the Truth in Caller ID Act. Violations of these terms are grounds for immediate suspension and termination of service. The Company reserves the right to terminate service to any customer found to be originating illegal robocall traffic.

C. Upstream Provider Contractual Obligations

Qué Tal Mobile's agreements with its upstream MVNE and underlying MNO(s) include provisions requiring those providers to comply with all applicable FCC robocall mitigation and STIR/SHAKEN requirements. The upstream providers are registered in the FCC's Robocall Mitigation Database and are responsible for STIR/SHAKEN implementation and attestation for traffic originating on their networks, including traffic from Qué Tal Mobile subscribers. The Company conducts due diligence to confirm that its upstream providers remain registered in the RMD.

D. Traffic Monitoring and Anomaly Detection

Qué Tal Mobile monitors subscriber usage patterns for anomalies indicative of potential robocall abuse, including but not limited to: unusually high outbound call volumes from individual lines, calls to sequential or patterned number ranges, high rates of short-duration calls, and calls with spoofed or invalid caller ID information. Accounts exhibiting such patterns are subject to immediate investigation, usage restriction, and suspension pending review.

E. Response to Traceback Requests

Qué Tal Mobile commits to responding to all traceback requests from the FCC, civil law enforcement, criminal law enforcement, and the industry traceback consortium (currently USTelecom's Industry Traceback Group) within 24 hours of receipt. The Company has designated a regulatory contact responsible for receiving and responding to traceback requests promptly. Contact information for this individual is maintained in the Company's RMD filing and will be updated within 10 business days of any change.

F. Cooperation with Enforcement

Qué Tal Mobile cooperates fully with the FCC Enforcement Bureau, law enforcement agencies, and the industry traceback consortium in investigating and stopping illegal robocall campaigns that may use the Company's service. The Company will promptly take action to block, suspend, or terminate service to any customer identified as originating illegal robocall traffic, and will preserve relevant records to support enforcement actions.

G. Call Analytics

Qué Tal Mobile relies on call analytics capabilities provided by its upstream MVNE and network provider(s) to assist in the identification of suspicious traffic patterns. The Company evaluates the use of additional third-party call analytics tools on an ongoing basis and will implement such tools as they become available and practical for an MVNO operating without direct network infrastructure control.

IV. PRIOR ENFORCEMENT ACTIONS

Qué Tal Mobile, LLC has not, at any time in the prior two years, 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 transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, and has not filed a deficient Robocall Mitigation Database certification or mitigation program description. The Company has not been removed from, or barred from filing in, the Robocall Mitigation Database.

V. COMMITMENT TO ONGOING COMPLIANCE

Qué Tal Mobile, LLC is committed to ongoing compliance with all FCC robocall mitigation requirements. The Company will update this Robocall Mitigation Program Description within 10 business days if any material information changes, and will recertify its RMD filing annually as required. The Company will continue to evaluate and implement additional mitigation measures as they become technically and operationally feasible.

CERTIFICATION

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I am authorized to submit this filing on behalf of Qué Tal Mobile, LLC.

Signature:  _____

Printed Name: Aaron Bell

Title: Chief Operating Officer

Date: February 27, 2026

On Behalf of: Qué Tal Mobile, LLC