



LAW ENFORCEMENT GUIDELINES

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I. Purpose

These Law Enforcement Guidelines (“Guidelines”) serve as guidelines for United States (U.S.) and state law enforcement and governmental agencies (together, “LEA”) serving requests for subscriber information on Liberty Communications of Puerto Rico LLC, Liberty Mobile of Puerto Rico Inc., BBVI, LLC, and Liberty Mobile of USVI Inc. (in conjunction, “Liberty” or “Company”).

Liberty provides video, internet, telephony and wireless services and other telecommunications and value-added services to residential and business customers in Puerto Rico and the U.S. Virgin Islands. Liberty assists government and law enforcement agencies in their investigations in accordance with applicable law, while protecting subscriber privacy as required by law and applicable privacy policies. Liberty complies with all applicable state and federal laws.

The main federal statutes that Liberty must observe when releasing subscriber information are: the Cable Communications Policy Act of 1984 (47 U.S.C. § 551); the Electronic Communications Privacy Act (“ECPA”) (18 U.S.C. §§ 2510-2522, 2701-2712, 3121-3127); the Communications Assistance for Law Enforcement Act (“CALEA”) (47 U.S.C. §§ 1001-1010); the Telecommunications Act of 1996 (particularly, 47 U.S.C. § 222 pertaining to customer proprietary network information or CPNI); and Puerto Rico’s Domestic Abuse Prevention and Intervention Act, Act No. 54-1989.

These Guidelines have been created to provide basic information about the procedures implemented by Liberty to assist law enforcement and for compliance with all valid US or US state governmental legal and criminal requests, including subpoenas, summons, court orders and/or warrants seeking information, documents, or testimony. Orders for live surveillance, including installation of wiretaps, pen registers, trap and trace devices or access to Liberty’s databases and cell towers via stingray devices, are the subject of our separate Communications Assistance for Law Enforcement Act (“CALEA”) Systems Security and Integrity (“SSI”) Policies and Procedures Manual for Liberty Communications of Puerto Rico LLC and its covered affiliates subject to CALEA (“Liberty SSI Manual”), which is available upon request.

Liberty expressly reserves the right to add, change, or delete any information contained in these Guidelines at any time and without notice. Liberty reserves the right to respond or object to, or seek clarification of, any legal requests and treat legal requests for subscriber information in any manner consistent with applicable laws. Liberty may provide its customers notice of legal process when records or information are sought by subpoena unless prohibited by law.

Note: These Guidelines are provided for informational purposes and U.S. state and federal, Puerto Rico and U.S. Virgin Islands law enforcement use only. For instructions regarding



matters that are not government or law enforcement related, including civil requests, please email the Legal Department at legalrequests@libertypr.com.

II. Contact Information

Liberty’s Legal Department is responsible for the production of Liberty’s records involving subscriber information for cable, internet, telephony, and wireless services in Puerto Rico and the U.S. Virgin Islands.

The following contact information should be used to serve any legal request on Liberty, or to reach Liberty’s U.S. law enforcement point of contact (“LEPOC”) or Legal Department for inquiries about the status of pending requests, legal process, or other similar information concerning Liberty subscribers:

Email Address (preferred):
legalrequests@libertypr.com

Postal Address:
 Attn: Legal Department
 PO Box 192296
 San Juan, PR 00919-2296

Physical Address:
 Attn. Legal Department
 279 Ave Ponce de Leon
 San Juan, PR 00918

The following Company employees are designated to serve as points of contact for law enforcement agencies seeking access to customer records or communications, or to use Company facilities and personnel to implement lawful surveillance orders and to oversee Company implementation of surveillance under the policies and procedures set forth in Liberty’s SSI Manual. The employees will be available to law enforcement agencies during the times listed below so that law enforcement agencies will always be able to contact at least one listed employee 24 hours a day, 7 days a week. If, on a temporary or emergency basis, an employee cannot be available at a designated time, that employee will arrange for one of the other employees listed below to be available at that time.

Designation	Name	Position Title	Days and Times Available	Telephone Number(s) Email Addresses
LEPOC	Alexandra Verdiales	Deputy Head of Compliance and Ethics	Via email during regular business hours. Through mobile phone at other hours.	Mobile (787) 397-1150 alexandra.verdiales@lla.com
Security Officer	Carla Framil	VP, General Counsel	Via email during regular business hours. Through mobile phone at other hours.	Mobile (787) 942-0106 carla.framil@libertypr.com
Backup LEPOC	Suheilian Izquierdo	Compliance Paralegal	Via email during regular business hours. Through mobile phone at other hours	Mobile (787) 925-2920 suheilian.izquierdo@libertypr.com legalrequests@libertypr.com

Backup LEPOC	Juan Alvarez	Associate Manager, Compliance & Ethics	Via email during regular business hours. Through mobile phone at other hours	Mobile (787) 925-8128 juan.alvarez1@libertypr.com legalrequests@libertypr.com
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Note: Some requests for historical information related to Liberty Mobile’s wireless service in Puerto Rico and the U.S. Virgin Islands may have to be processed by AT&T. In those cases, LEAs must direct requests to AT&T.

III. Time for Response

Liberty’s primary goal is to provide timely and accurate responses to all law enforcement and legal requests. Unless otherwise permitted by the deadline for production in the request, Liberty will strive to provide a response within five (5) days of its receipt of each request (exceptions may be requested for cases that involve child exploitation and emergency situations; an emergency requests form is included at the end of these Guidelines). Legal requests should be served to Liberty on the date they are issued. Liberty reserves the right to request extensions for legal requests.

IV. Subscriber Account Identification and Related Records

Upon receipt of a properly executed, valid and authorized administrative, grand jury, or judicial subpoena, and depending on the Liberty service(s) to which the customer is subscribed, Liberty will disclose basic subscriber information, as defined in 18 U.S.C. § 2703, within its possession, custody, or control. This basic subscriber information may include: name, address, local and long distance telephone connection records (call detail) or records of session times and duration, length of service subscribed to and types of service utilized, telephone or instrument number (including any temporarily assigned network address or IP address), and means and source of payment for such service, if available. Any other requests for subscriber records or information will require a court order or a warrant.

- Legal requests must be submitted within 180 days from the date of the incident. Under Liberty’s data retention policies, and unless a valid and timely preservation request is made, Liberty cannot guarantee the availability of responsive information for legal requests submitted after 180 days.
- Subject to certain exceptions, the Cable Act permits Liberty, as a cable operator, to disclose personally identifiable information (“PII”) to a U.S. or U.S. state governmental entity *solely* in response to a court order (and not, for example, a subpoena) in a criminal proceeding or with the subscriber’s express written consent. When the request is related to an account that has cable TV service only, the Cable Act requires that the cable subscriber be afforded the opportunity to appear and contest in a court hearing relevant to the court order any claims made in support of the probable cause court order. At the proceeding, the Cable Act requires the U.S. or U.S. State governmental entity to offer clear and convincing evidence that the subject of the information is reasonably suspected of engaging in criminal activity and that the information sought would be material evidence in the case. See 47

U.S.C. § 551(h). Once this opportunity has been afforded to the subscriber, and the court enters an appropriate order, then Liberty may respond.

- The Cable Act permits a cable operator to disclose PII concerning a subscriber (with the exception of the selection of video programming) in response to valid legal process issued pursuant to ECPA. Accordingly, upon Liberty's receipt of valid ECPA process relating to Liberty's cable services, we may disclose PII on our cable subscribers except for information on the selection of video programming.
- If you are seeking information known as cell site location information ("CSLI"), consistent with recent case law, you must submit a state or federal warrant. As noted above, some requests for historical information related to Liberty Mobile's wireless service in Puerto Rico and the U.S. Virgin Islands may have to be served and processed by AT&T.
- Liberty does not store the content of text or email messages.

For subscriber identification based upon an *IP Address*:

Please visit <https://www.arin.net/> to confirm that the IP address is assigned to Liberty before sending us a legal request.

In order for Liberty to fulfill a request for customer records regarding an IP address, you must provide the following:

- a) IP address
- b) Specific date (date ranges are not acceptable)
- c) Specific time (time ranges are not acceptable)
- d) Time zone during which the IP was in use
- e) For Carrier-grade Network Address Translation ("CGNAT") IP addresses, a port number is required

Consider the following:

- Liberty's system of allocating IP addresses uses Dynamic Host Configuration Protocol ("DHCP"). This means that Liberty's subscribers are not assigned a constant or static IP address. Instead, a dynamic IP address is assigned and has the potential to change throughout the course of service at any day or time.
- Liberty also uses CGNAT IP addresses. CGNAT shares a single public IP address among multiple customers at the same time. The effect of using CGNAT is that this shared public IP address is converted within Liberty's network to various private IP addresses, which are then assigned to Liberty's customers. In other words, multiple, separate customers share the same public IP address. As such, a port number will be required to have full identification capability; specifically, we will need the "**Source Public Port**" linked with the IP address at the dates and times requested to identify any particular Liberty

customer. Time sessions cannot overlap when using the same port number and IP address. For example, two IP sessions cannot have different start times but the same end time, or the same start time but different end times. This will result in an invalid search.

- Liberty does not store IP address logs for its wireless customers. Consequently, IP addresses may not be used to determine which mobile subscriber was using an IP address at any particular time or date.

For subscriber identification based upon a VoIP or mobile wireless *telephone number*:

Liberty can only provide account information on telephone numbers for which we currently or have historically provided service.

For subscriber identification based upon a *person's name*:

Liberty cannot identify a subscriber based upon a name alone. It is necessary to include other identifiable information regarding the subscriber, for example, the social security number or date of birth, street address where it is believed the individual receives service, account number, phone number or other identifiable information.

For subscriber identification based upon a *Liberty account number*:

Please provide the complete account number. Liberty is unable to process legal requests with incomplete account numbers.

For subscriber identification based upon an *address*:

It is necessary to provide an entire address. In the legal request, please supply the house or apartment number, the street name, and the city, state, and the zip code of the location you have targeted. Over a length of time, it is possible that Liberty has supplied service to multiple customers at the same address. Therefore, it may be necessary to narrow a search for customer identity to a specific period of time.

For subscriber identification based upon a specific *payment method*:

Liberty may be able to identify a subscriber based upon a payment method if you provide the following:

- Payment method
 - a. For a bank account search, provide complete account number and routing number
- Payment date
- Payment amount

V. Special Considerations

Child Exploitation: Liberty prioritizes lawful demands for subscriber information that relate to the exploitation of children. In order for Liberty to expedite the request, the request must reference that the matter involves Child Exploitation in the subject of the email and include the completed Emergency Situation Disclosure Request Form in the format attached hereto.

Emergency Disclosure: 18 U.S.C. § 2702(b)(8) and § 2702(c)(4) contain provisions for the expedited release of subscriber information in situations where there is an immediate danger of death or an immediate risk of serious bodily injury. In order to notify Liberty of the emergency request, please immediately text and call us at the numbers listed in these Guidelines and complete, sign, and submit the Emergency Situation Disclosure Request Form to all emails listed in these Guidelines. The request must reference that the matter involves an Emergency Situation in the subject of the email and include the completed Emergency Situation Disclosure Request Form.

Domestic Abuse Prevention and Intervention Act (“Law 54”): Puerto Rico Act No. 54 of August 15, 1989, 8 L.P.R.A. §§ 601, et seq., (“Law 54”) provides that victims of domestic family or non-family abuse may seek a restraining or anti-stalking order designed to protect life, security, and dignity of women and men, but also to protect the family unit. In situations involving Law 54, Liberty will deem requests an Emergency Disclosure as set forth above. Once Liberty is informed that a subscriber may be a victim of domestic abuse (or an abuser), and following the presentation of a valid court order, records and communications in the subscriber account may be subject to additional protections against release or disclosure. Furthermore, account responsibility for mobile and/or telephone service may be transferred to the victim. Victims should call the National Domestic Violence Hotline at 1-800-799-SAFE or visit www.TheHotline.org.

Wiretaps and Interception of Communications: CALEA and ECPA provide mechanisms for authorizing and approving the interception of wire, oral, or electronic communications. Requests for technical assistance, to intercept communications (voice, text or data), or to install any wiretap or pen register/ trap and trace devices require warrants or court orders in compliance with CALEA, ECPA and Liberty’s SSI Manual. For detailed procedures regarding the interception of communications, please refer to Liberty’s SSI Manual, which is available upon request.

VI. Record Retention

- **Subscriber Information:** Liberty maintains active subscriber information, including name, address, type of service, service activation date, MAC address/IMEI, service & current billing address, phone number, Integrated Circuit Card Identification Number (ICCID or Sim Card) while service is active and for six (6) months after termination or churn.
- **IP Address Information:** Liberty maintains its dynamic IP address log files for a period of six (6) months. Unless a valid and timely preservation request is made, Liberty cannot guarantee the availability of responsive information for dynamic IP addresses used more than six (6) months prior to receipt of the request.

- **Retail Store Videos:** Liberty maintains retail store videos for thirty (30) days.
- **Payment Information:** Limited payment information may be available for twelve (12) months.
- **Subscriber Invoices:** Liberty maintains customer invoices for five (5) years.
- **Call Detail Records:** Liberty maintains call detail records for our VoIP and mobile wireless telephone service independent of invoices for a period of eighteen (18) months. This includes local and long-distance records.
- **Voicemail:** Liberty retains un-deleted voicemails for thirty (30) days.
- **Cell Site Information:** Liberty maintains cell site location information for voice, SMS, and/or data service for eighteen (18) months.
- **Special Considerations:**
 - Liberty generally is not able to provide records known as tower dumps.
 - Liberty generally is not able to provide timing advance data.
 - Liberty does not maintain records indicating Wi-Fi router usage or location for voice calls, SMS, or internet access.
 - Liberty does not retain SMS nor email content.

VII. Preservation Request

Liberty, upon the valid request of a LEA, will take all necessary steps to preserve subscriber data and other evidence in its possession pending the issuance of a court order or other legal process. No information can be released until Liberty receives a formal and valid legal request.

The information will be retained for a period of ninety (90) days, which shall be extended for an additional ninety (90) day period upon a renewed request by the LEA submitting the original preservation request. If no valid legal request is made, the information will be permanently deleted.

Preservation Requests may not ask to preserve information prospectively and repeated daily requests will be deemed to be an avoidance of proper legal process for a wiretap or other live access.

VIII. Non-US Foreign Requests

If you are making a request for information from outside of the United States, please be advised that Liberty will comply with those requests in compliance with applicable laws, treaties, and conventions. All foreign legal requests must be completely in English, and all other requirements

as documented in these Guidelines must be followed. Depending on the type of process served on Liberty, Liberty may require that process issued from outside of Puerto Rico or the USVI be domesticated or handled through federal law enforcement channels.

IX. Reimbursement Fees

Liberty does not generally charge for responses to valid legal requests served by a government entity. However, Liberty reserves the right to seek reimbursement for processing and responding to all legal requests as permitted by law. Our policy is to discuss reimbursement with the requesting party before we incur any significant costs.

Quick Reference Checklist

The checklist below is a quick reference guide for producing a valid legal request to Liberty and will help reduce processing time associated with overly broad or erroneous requests.

- Verify that the landline or wireless phone number or IP address is registered to Liberty.
- Limit each request to no more than three (3) IP addresses, telephone numbers, or other identifiable information per individual on each legal request. Requests that contain more than three (3) IP addresses may require a longer time period to respond.
- Include the IP address and the specific date, time and time zone of each incident. i.e., December 31, 2021, at 12:21:03 CST and, if CGNAT, include the "Source Public Port" number. Time sessions cannot overlap when using the same port number and IP address. For some requests, a Source Public Port number is essential for identifying a Liberty subscriber. Requests for identifying subscriber usage of any IP address must be made within six (6) months of the incident.
- Include the phone number and the timeframe for which you need subscriber telephone connection, account, or call detail records.
- Specifically state on your request what you require Liberty to provide and be sure it conforms to applicable law; overly broad requests often require additional follow-up and may slow response time.
- Ensure that you have complied with all applicable substantive and procedural requirements under the particular statutes or regulations authorizing your request.
- Ensure that all of your contact information is correct. Liberty will return legal requests via email unless otherwise requested in the subpoena or order.
- Do not ask us to preserve information prospectively. Do not make the same preservation request repeatedly.
- If your legal process is issued from a US state governmental entity or court, you may be asked to domesticate such process in Puerto Rico or USVI before Liberty can respond.
- In the event of an emergency, please complete and submit the attached form and contact us immediately by email, text **and** phone.



If Liberty makes an emergency disclosure to your US law enforcement agency or US governmental entity pursuant to 18 U.S.C. § 2702(b) or § 2702(c), you agree that Liberty is entitled to reimbursement for costs and fees pursuant to 18 U.S.C. §2706.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Printed Name

Signature

Title

Date

Name of LEA

Address

Telephone number

Email