

Bezeq International robocall mitigation program

Bezeq International is a licensed telecom operator with offices at 40 Shacham St., Petach Tikva 4951731, Israel.

Bezeq International has organic retail traffic of its own customers (either private individuals or business retail customers), including outbound traffic to destinations within the United States.

Bezeq International has registered with the FCC with FRN 0030926133 (RMD0002342).

In order to mitigate unsolicited calls, including robocalls, Bezeq International applies measures intended to detect suspicious traffic patterns and block applicable traffic, including both automatic monitoring using fraud systems and manual procedures. Bezeq International certifies that all calls that originate on its network are subject to a robocall mitigation program as described herein.

Following is a brief description of the measures applied:

a) Automatic approach

Bezeq International has designed a monitoring tool used to monitor, in real time, outbound voice traffic patterns. This tool relies on the following rules and benchmarks:

- 1) **Low ASR (Answer Seizure Ratio):** Specific originating number to +1 destination that dials more than 999 calls in 1 hour, verified every 15 minutes precision, regardless of the calls' duration.
- 2) **High call duration hourly:** Specific originating number to +1 destination that creates more than 499 duration of minutes in 1-hour time units.
- 3) **High call duration daily:** Every +1 origin number that creates more than 999 duration of minutes in 24 hours.
- 4) **Repeating +1 origin numbers:** every +1 origin number that perform more than 100 attempts (regardless to call durations or volumes).
- 5) **"know-your-provider" records:** Bezeq International keeps a record of every call 3 years backwards with the full call details.

An originating number that falls into any of the abovementioned categories raises an immediate alert and is promptly reviewed. If the review reveals that the traffic is of an abusive nature, any further outgoing traffic on Bezeq International's network from the applicable originating number will be blocked. The maximum time for blocking is within 24 hours, although in most cases numbers are blocked within 1 hour from the moment the alert is raised.

b) Manual approach

Bezeq International actively checks +1 destinations voice traffic according to the following procedures:

- 1) Bezeq International manually monitors network statistics, in search of anomalies that may indicate fraud, robo-dialing, or other forms of abuse.
- 2) Bezeq International has developed the ability to respond to tracebacks within 24 hours.

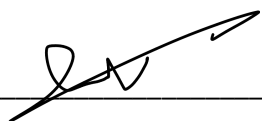
In addition to the above, Bezeq International certifies that it will commit to respond to investigation requests from the Commission or law enforcement agencies and will cooperate with best efforts with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Bezeq International also certifies, for its knowledge, that it has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or call spoofing.

The designated person for this activity and mitigation plan is –

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Signature –



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