

Hughes Network Systems, L.L.C Robocall Mitigation Program

Hughes Network Systems, L.L.C. (“Hughes”) submits this Robocall Mitigation Program as required by 47 C.F.R. § 64.6305.

Hughes is a reseller of voice services, exclusively provided by Big River Telephone Company, LLC (“Big River”). Big River has certified that all voice traffic that originates on its network is authenticated with STIR/SHAKEN, pursuant to 47 CFR § 64.6301(a). Hughes and Big River have taken a number of reasonable steps to avoid originating, carrying, or processing illegal robocall traffic pursuant to 47 C.F.R. § 64.6305(a).

1. “Know-Your-Customer” Procedures

Hughes takes reasonable steps to prevent new and renewing customers from originating illegal calls, including through its “know-your-customer” procedures. All subscribers are subject to an Acceptable Use Policy. In the Acceptable Use Policies for residential and business customers, Hughes makes clear that a subscriber’s account is for limited purposes only and cannot be used for other purposes such as autodialing, monitoring, or for sending spam, mass automated communications. Hughes also prohibits subscribers from impersonating others, using fake or forged headers, fabricating domain names, and other types of deceptive addressing and spoofing. Hughes reserves the right to suspend or terminate an account without notice for engaging in any of those prohibited practices.

2. “Know-Your-Upstream Provider” Procedures

Hughes executed a Master Services Agreement (“MSA”) with Big River Telephone Company, LLC (“Big River”) as Hughes’ exclusive originating and terminating IP-based commercial telephone service provider for both upstream and downstream traffic. The MSA obligates Big River to comply with all regulatory requirements governing their services. Big River is Hughes’ only provider and Hughes does not have the capability to originate voice calls for its customers. Big River certified complete STIR/SHAKEN implementation in the Robocall Mitigation Database and filed a Robocall Mitigation Program as a voice service provider.

Big River utilizes call analytics software from Neustar’s (part of Transunion) to assist with the detection of illegal robocalls on its network. Big River has implemented internal monitoring and reporting procedures designed to detect and prevent fraudulent traffic on its network. If Big River has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

3. Commitment to Respond Fully to Traceback Requests

Hughes commits to fully respond to traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium within 24 hours, pursuant to 47 CFR § 64.1200(n)(1); 47 CFR § 64.6305(a)(2). Hughes also commits to fully cooperating

with such entities in investigating and stopping illegal robocallers that use its service to carry or process illegal calls. 47 CFR §§ 64.6305(a)(2), 64.6305(d)(2)(iii).

4. *Company Information*

Hughes Network Systems L.L.C. (“Hughes”) is a limited liability company and is a wholly owned, indirect subsidiary of Hughes Communications, Inc (“HCI”). HCI is a wholly owned, direct subsidiary of Hughes Satellite Systems Corporation (“HSSC”). On June 8, 2011, Hughes was acquired by EchoStar Corporation (“EchoStar”) and became a wholly owned, direct subsidiary of EchoStar.

The principals that may exercise management or control of Hughes are:

- Charles W. Ergen, Co-founder and Chairman of the Board
- Cantey Ergen, Co-founder and EchoStar Director
- Hamid Akhavan, President, Chief Executive Officer and EchoStar Director
- Dean Manson, Chief Legal Officer and Secretary
- Gary Schanman, Executive Vice President and Group President, Video Services
- George R. Brokaw, EchoStar Director
- Jim DeFranco, Co-founder and EchoStar Director
- John Swieringa, President, Technology and Chief Operating Officer
- Kathleen Q. Abernathy, EchoStar Director
- Lisa W. Hershman, EchoStar Director
- Milton (Trip) von Minden, Vice President, Tax
- Paul Gaske, Chief Operating Officer, Hughes
- Paul W. Orban, Executive Vice President and Chief Financial Officer, DISH (Principal Financial Officer of EchoStar)
- R. Stanton Dodge, EchoStar Director
- Stephen Bye EchoStar Director
- Tom Ortolf, EchoStar Director
- William D. Wade, EchoStar Director
- Michelle Pearre, Chief Human Resources Officer, HNS
- Ramesh Ramaswamy, Executive Vice President – International, HNS

CERTIFICATION PURSUANT TO 47 C.F.R. § 64.6305(d)(3)(ii)

Pursuant to 47 C.F.R. § 1.16, I declare under penalty of perjury that the statements contained within the foregoing Robocall Mitigation Program are true and accurate to the best of my current information, knowledge and belief.

Executed on December 24, 2024

A handwritten signature in black ink, appearing to read "Alison Minea", written over a horizontal line.

Alison Minea
Vice President and Associate General Counsel
EchoStar Corporation