



HOT-net robocall mitigation program

HOT-net is a licensed telecom operator with offices at Spain building, Europe Park, Yakum, Israel.

HOT-net has organic retail traffic of its own customers including outbound traffic to the United States.

HOT-net has registered with the FCC with FRN 0031161904.

In order to mitigate unsolicited calls, including robocalls, HOT-net applies measures intended to detect suspicious traffic patterns and block applicable traffic, including both automatic monitoring using:

Anti-fraud systems and manual procedures.

HOT-net 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 measures

HOT-net 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: HOT-net 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 HOT-net 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 measures

HOT-net actively checks +1 destinations voice traffic according to the following



procedures:

1. HOT-net manually monitors network statistics, in search of anomalies that may indicate fraud, robo-dialing, or other forms of abuse.

2. HOT-net has developed the ability to respond to trace backs within 24 hours.

In addition to the above, HOT-net 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. HOT-net 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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