

Hunter Carrier Services Robocall Mitigation Compliance with TRACED Act

Hunter Carrier Services (the "Company") is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

Hunter Carrier Services has fully implemented STIR/SHAKEN.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Hunter Carrier Services to carry or process illegal calls. When notified by the FCC's Enforcement Bureau, Hunter Carrier Services shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless HCS's investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If HCS determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

Hunter Carrier Services utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company's networks. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- Agreement with Twilio to monitor and notify any suspicious traffic.
- All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Hunter Carrier Services specializes in providing service to local and state government entities consisting of over 10% of NJ Municipalities, School districts including the largest in the state, First responders, Offices of Emergency Management, State Universities, Hospitals, multi site medical and legal practices.

Hunter Carrier Services verifies all DID and Toll Free DIDs and establishes our strict guidelines with perspective and existing clients. An FCC profile is created consisting of state EIN numbers, legal name and addresses registered with the state as well as website. All DIDs and Toll Free DIDs have Stir/Shaken implemented and CNAM applied matching the State registration name and or DBA. All calls receive level A attestation, the highest attestation given by the originating service provider to indicate that the caller is known and has the right to use the phone number as the caller ID

Hunter Carrier Services has one upstream provider from which it receives voice traffic.

Twilio Inc

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Twilio has achieved full compliance with Stir/Shaken protocol which ensures phone calls transmitted via its platform are legitimate and authenticated. Twilio has enrolled in the FCC's robocall mitigation database through which Hunter Carrier Services has submitted its robocall mitigation policy to.

Hunter Carrier Services reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s),

trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.