



HFL Networks LLC - Robocall Mitigation Plan

This plan describes the specific and reasonable steps that HFL Networks LLC (HFL) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

1. Affirmative, Effective Measures to Prevent Customers from Originating Illegal Robocalls:

- a. HFL operates as an intermediate provider for a private group of entities who operate as originating providers.
- b. HFL has implemented provisions with this private group to avoid originating robocall traffic.

2. “Know-Your-Upstream-Provider” Program:

- a. HFL operates as an intermediate provider for a private group of entities who operate as originating providers. No other originating providers can use these services.

3. Call Analytics Systems:

- a. HFL monitors usage for signs of fraudulent and abusive behavior.

4. Commitment to Respond to Traceback Requests

- a. HFL is capable & committed to respond within 24 hours, to traceback requests from the FCC, law enforcement, and the industry traceback consortium.