

Robocall Mitigation Plan

HMA Communications LLC

Company Information

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Introduction

HMA Communications LLC is committed to combatting the spread of illegal robocalls in compliance with Federal Communications Commission (FCC) rules, regulations, and the TRACED Act. The purpose of this Robocall Mitigation Plan (RMP) is to define the policies, procedures, and safeguards HMA Communications has implemented to prevent the origination of illegal robocalls on our network.

Policy

HMA Communications LLC maintains a strict zero-tolerance policy against illegal robocalls. We do not originate, promote, or condone robocall activity in violation of FCC rules and regulations. We take proactive measures to prevent such calls and to ensure the integrity of our communications network.

Customer Due Diligence

Before providing service, HMA Communications thoroughly vets all customers to ensure compliance with our anti-robocall policies. Our due diligence process includes:

1. Verifying the legal existence and good standing of the business through government or third-party documentation.
2. Collecting and confirming accurate contact and ownership information for all customers.

3. Reviewing the customer's past compliance with telecommunications regulations and investigating any history of unlawful robocall activity.

4. Requiring all customers to formally agree to HMA Communications' prohibition on illegal robocalls as a condition of service.

Monitoring and Enforcement

HMA Communications LLC continuously monitors network traffic for patterns consistent with illegal robocall activity. If suspicious activity is detected, we promptly investigate and take corrective measures, which may include warnings, call blocking, or termination of service for non-compliance.

Investigation of Complaints

We promptly investigate all complaints regarding potential illegal robocalls originating from our network. HMA Communications fully cooperates with law enforcement agencies, the FCC, and other regulatory bodies.

We actively participate in traceback efforts initiated by the FCC, law enforcement, or the USTelecom Industry Traceback Group. If identified as an originating or intermediate provider during a traceback, HMA Communications pledges full cooperation and transparency in providing the information necessary to support the investigation.

Traceback investigations are an essential industry tool for identifying and holding bad actors accountable. HMA Communications LLC is committed to supporting these efforts and working collaboratively with regulators and industry stakeholders to reduce illegal robocalls.

Staff Training

All HMA Communications employees undergo training on our robocall mitigation policies and procedures. This includes: - Recognizing red flags associated with illegal robocall activity. Understanding the proper escalation process when suspicious traffic is identified. - Following regulatory guidelines and internal procedures to ensure compliance.

STIR/SHAKEN Compliance

HMA Communications LLC is fully compliant with FCC requirements related to caller ID authentication and anti-spoofing measures. Our network supports STIR/SHAKEN protocols to authenticate and verify caller ID information.

- Calls originating on our network are authenticated and attested at the appropriate level (typically B-level attestation) when Caller IDs are validated. - We only allow calls to originate from Caller IDs that are either assigned directly by HMA Communications or verified prior to

authentication. - Our systems are designed to detect and block spoofed or manipulated caller ID attempts.

Review and Revision

This Robocall Mitigation Plan is subject to ongoing review and revision to ensure compliance with evolving FCC rules, industry best practices, and technological advancements. HMA Communications LLC is committed to continuously improving our processes to protect consumers and reduce the impact of illegal robocalls.