



Robocall Mitigation Plan

HOTSPOTPR BROADBAND INTERNET, LLC

Headquarters: CARR 167 MARGINAL BRAULIO DUENO, BAYAMON, PR 00958

Certification Status:

HOTSPOTPR BROADBAND INTERNET, LLC has not been prohibited from filing a certification in the FCC's Robocall Mitigation Database.

Enforcement History:

HOTSPOTPR BROADBAND INTERNET, LLC has no history of enforcement actions related to illegal robocalls or violations of relevant state laws.

Affirmative Measures to Prevent Illegal Robocalls

1. Know Your Customer (KYC)

We implement robust vetting procedures for both new and existing customers, in alignment with best practices recommended by the **NANC Call Authentication Trust Anchor Working Group**. These include:

- Collecting and reviewing identifying business documentation.
- Assessing operational legitimacy and intent.

If we detect suspicious robocall traffic originating from a customer, we take the following actions:

1. **Issue a warning** instructing the customer to immediately cease such activity.
 2. **Terminate service** if the activity persists.
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2. Know Your Upstream Provider

We apply a thorough vetting and review process to all upstream providers that send us voice traffic. Our policy includes:

- Confirming that each upstream provider is certified in the FCC's Robocall Mitigation Database.
- Rejecting voice traffic from unregistered or uncertified providers.

In cases where we detect potential illegal robocall traffic from an upstream provider:

1. We issue a **formal warning**.

2. Continued non-compliance results in **termination of service**.
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3. Traceback Cooperation

We respond to traceback requests from the FCC, law enforcement, and the designated traceback consortium **within 24 hours**. Our company:

- Fully cooperates with investigations.
 - Supports efforts to identify and halt the origination or transit of illegal robocalls.
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4. Robocall Mitigation Program

To proactively detect and mitigate robocall threats, we utilize **TransNexus call analytics software**, which allows us to:

- Monitor voice traffic in real time.
- Generate detailed reports flagging suspicious robocalls.

Upon identifying suspect calls, we:

1. Conduct internal investigations.
 2. Issue warnings to the responsible party.
 3. Terminate service if illegal call activity continues.
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HOTSPOTPR BROADBAND INTERNET, LLC is committed to maintaining a secure and compliant telecommunications environment by rigorously implementing these preventive measures.