

TUBE INCORPORATED DBA REACH MOBILE - ROBOCALL MITIGATION PLAN

ABOUT TUBE INCORPORATED DBA REACH MOBILE/ THAT'S MY MOBILE.

Tube Incorporated dba That's My Mobile and Reach Mobile is a C-Corporation formed under the laws of Delaware and is a registered carrier with the FCC (the "Company"). The Company holds the FRN/CORES ID Number: 0028122398 and holds 499 Filer ID Number: 832837.

The Company is a Mobile Virtual Network Operator (MVNO) and provides cellular service to individual end-user subscribers nationwide.

By nature of the Company's MVNO classification, the Company relies on a third-party carrier's network in order to offer cellular service to end subscribers. The Company is an MVNO; it has no real control over the facilities/network infrastructure necessary to implement any form of STIR/SHAKEN framework (since an MVNO does not own its infrastructure). The Company has no switches, owns no spectrum licenses, and holds no rental or lease space on any Cellular towers.

Based on the nature of the service that the Company offers to individual cellular subscribers, the risk for Robocalling, erroneous telemarketing, and other possible fraudulent telemarketing or use of such service for illegal telemarketing is extremely low. Since the service is provisioned on a single cellular device to retail users, which in most cases is not compatible with auto dialers, or other tools that could generate High Volume Short Duration (HVSD) calling, the risk for any form of robocalling is extremely and inherently low.

In light of the low risk of illegal calls being originated, the Company has tailored its Robocall Mitigation Program in light of the low risk of illegal robocalls being originated on its networks. The reasonable measures the Company takes, given the level of risk it faces, are described in this plan.

The Company's primary place of business is:

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Company Leadership:

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STIR/SHAKEN Implementation

The Company has no defined implementation related to STIR/SHAKEN and the parameters of the call authentication framework. As an MVNO, the Company is not able to implement SIR/SHAKEN in any manner. Since the Company lacks control over the facilities and network infrastructure necessary to implement STIR/SHAKEN, and the Company has no defined infrastructure, the Company has no ability to assign its own calls.

Therefore, the Company is excluded from the FCC's STIR/SHAKEN implementation obligation pursuant to paragraph 40 of the FCC's First Call Authentication Report and Order. Alternatively, the Company relies on its underlying facilities-based carrier partner(s), which own and maintain the network infrastructure, to implement and utilize STIR/SHAKEN authentication.

In relation to the initial and subsequent FCC Orders concerning STIR/SHAKEN and the Robocall Mitigation Database (RMD), the Company clearly serves as a voice service provider in the call chain and is without STIR/SHAKEN obligation.

ROBOCALL Mitigation Plan

As mentioned previously, as an MVNO, the company is at minimal risk for any Robocalling to take place since the Service the Company provides is for individual retail cellular subscribers' use. However, the Company does have an established process in place to combat any risks it may face.

KNOW YOUR CUSTOMER - SUBSCRIBER KYC & DUE DILIGENCE

The Company has only Postpaid and Prepaid plans. Due to the nature of the Company's business model and of the service plans, the individual subscriber enters into a contract term subscriber Agreement with the Company.

Upon establishing a relationship with the Company, the Subscriber is not only required to sign a Service Agreement with the Company for a designated length of time, but the Subscriber must also agree to abide by all Terms and Conditions of Use, the Company Privacy Policy, and the Company Acceptable Use Policy.

In each document that the Subscriber either executes individually with the Company (Subscriber Agreement) and/or documents that are incorporated by reference into that Agreement, the Company has the right to halt, suspend for an indefinite period of time, and or terminate service to any subscriber who violates any of the Company's governing documents.

Immediate suspension or termination of a Subscriber by the Company can be based on any violations of the Company AUP. The Company's AUP specifically forbids the end user from purporting any form of telemarketing and/or robocalls and, amongst other things, the AUP defines other unlawful uses of Service by the Subscriber and/or any individual who may access or use a Subscriber's device (of which the Subscriber is responsible), or any other policy which is governed by the Company.

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PREVENTING ILLEGAL ROBOCALLS

As an MVNO that originates end-user calls, the Company does not deal with any upstream providers. All calls are routed through its underlying facilities-based carrier's network upon origination, and the Company has no involvement in any kind of provisioning.

Tube Incorporated presently has 100% reliance upon the networks of the underlying facilities-based carriers, with which it partners for service delivery and that underlying facilities-based carriers then provides to Company tools, and analytics software and/or reports and data generated from such tools, and analytics software for monitoring call traffic and to block relevant calls either on its own or at the request of the Company.

UPSTREAM PROVIDER/UNDERLYING FACILITIES-BASED CARRIER

As mentioned throughout this Robocall Mitigation Plan the Tube Incorporated is fully dependent upon the Company's underlying facilities-based carrier, of which the underlying facilities-based carrier owns all facilities, infrastructure, network systems, and cellular towers. The Company does not deal upstream providers.

TRACEBACK AND INQUIRY & RESPONSE

The Company commits to respond to all inquiries made by the FCC, law enforcement, the ITG, and/or any other like or similar governing body within 24 hours of request. The Company is committed to combating robocalling and other nefarious acts and violators of the TCPA; therefore, the Company shall always fully cooperate with these groups to investigate and stop any illegal activity and persons who try to commit such bad acts from using the Company's service to carry or process illegal calls.

Upon notification by any Federal agency, any regulatory governing body, the ITG, and/or any other like or similar agency or organization, the Company will immediately contact its underlying facilities-based carrier and request that it place a call block and also report any identified possible or actual illegal traffic. And the Company will then deal with both the agency making the request/inquiry and the underlying facilities-based Carrier to investigate any suspicious activity on an ongoing basis.

The Company will also have a Dedicated Point of Contact to deal with all inquiries from any law enforcement agency or ITG to deal with traceback requests.

COMPANY DECLARATION

The Company is not currently subject to a formal Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing, nor has it been so in the past two years.

The Company has the right to update, modify, and/or change this plan at any time, and such changes may be made by the Company's designated individual, when and as the Company's business model may change. The company shall immediately upload the new plan to the RMD.