

GABB WIRELESS

ROBOCALL MITIGATION PLAN

ABOUT GABB WIRELESS, INC.

Gabb Wireless, Inc. is a corporation formed under the laws of Utah and is a registered carrier with the FCC. The Company holds the FRN/CORES ID Number: 0028532877 and holds 499 Filer ID Number: 833140.

The Company is a Mobile Virtual Network Operator (MVNO) and provides single line cellular service to individual end user subscribers nationwide with a very unique business model.

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. Since 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 MNVO 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 which the Company offers to individual cellular subscribers the risk for Robocalling, erroneous telemarketing, robocalling and other possible nefarious activity is extremely low. Since the service is provisioned on a cellular device, which in most cases is not compatible with auto dialers (and/or other tools which could generate High Volume Short Duration (HVSD) calling) the risk for any form of robocalling is extremely and inherently low.

In light of the very 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 Company takes given the level of risk it faces are described in this plan.

The Company primary place of business is:

Street: 2701 N Thanksgiving Way, STE 500

City, State, Zip: Lehi, UT 84043

Main Number: 801-362-3552

General email address: accounting@gabb.com

Website: Gabb.com

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Company Leadership:

CEO:

Name: Nate Randle
Street: 2701 N Thanksgiving Way, STE 500
City, State, Zip: Lehi, UT 84043
Direct Dial: 801-319-3508
Email Address: nate.randle@gabb.com

CFO:

Name: Greg Cole
Street: 2701 N Thanksgiving Way, STE 500
City, State, Zip: Lehi, UT 84043
Direct Dial: 435-764-2201
Email Address: greg.cole@gabb.com

Designated RMD Contact:

Name: Chad Clegg
Street: 2701 N Thanksgiving Way, STE 500
City, State, Zip: Lehi, UT 84043
Direct Dial: 801-922-0103
Email Address: chad.clegg@gabb.com

STIR/SHAKEN Implementation

Company has no defined implementation related to STIR/SHAKEN and the parameters of call authentication framework. And 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; since the Company has no defined infrastructure

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 carrier partner(s), which own and maintain the network infrastructure, to implement and utilize STIR/SHAKEN authentication.

In relationship 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.

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As mentioned previously as an MVNO the company is at minimal risk for any to have any Robocalling take place since the Service the Company provides is of single line cellular subscriber 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

Due to the nature of the Company business model and of the service plans, the individual subscriber enters into a contact term subscriber Agreement with the Company and the Company is familiar with all Customers and knows fully the Customer profile, information and all pertinent details.

Upon establishing a relationship with the Company, the Subscriber is not only required to sign a Service Agreement with the Company, the Subscriber who is a Parent setting up service for their child must also agree to abide by all Terms and Conditions of Use, The Company Privacy Policy and also the Company Acceptable Use Policy.

In each document which the Subscriber either executes individually with the Company Terms and/or document which 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 governing documents.

Immediate suspension, or termination of a Subscriber by Company can be based on any violations of the Company AUP, among other things the unlawful use of Service by the Subscriber and/or any individual who may access or use a Subscribers device (of which the Subscriber is responsible) or any other policy which is governed by the Company.

PREVENTING ILLEGAL ROBOCALLS

As an MVNO all calls are routed through its underlying carrier's network upon origination and the Company has no involvement in any kind related to provisioning.

Gabb Wireless, Inc. is unique offering specifically geared for the youth market and providers a plan focused on the following:

- The device and services look like a regular smartphone but has locked parental controls.

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- The device does not have an internet browser, or social media and the Parent must access a special Apps section to determine if they would like to have that app specifically; downloaded to their child's phone.
- Completely safe for kids, no parental controls needed.

Due to the unique nature of the applicant and the service which the applicant offers (unlike any other wireless provider) the mission of the company is to protect kids and encourage life outside the screen. Gabb Wireless is not just a phone or a network it is a movement to protect kids by providing age-appropriate tech solutions.

The Company has reliance upon its underlying and Upstream providers/underlying carriers with which it partners for service delivery and that partner then provides to Company tools, and analytics software for monitoring call traffic and to block relevant calls either on its own or at the request of the Company.

However, the Company itself does not have or use any call analytics systems to identify and block illegal traffic since it has no control over the network in any manner, and as mentioned immediately informs its underlying provider of any steps that should be taken to halt or suspend any possible or actual activity unless provided however the underlying carrier takes those steps prior to any notification by the Company.

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 initial. 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 Company's service to carry or process illegal calls.

Upon notification by any Federal agency, any regulatory governing, the ITG, and/or any other like or similar agency or organization the Company will immediately contact its underlying provider and request to place a call block and also to 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 provider 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

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law enforcement agency or ITG to deal with traceback requests.

COMPANY DECLARATION

The Company is not under any investigation by any governmental agency or any like or similar organization and there is no action of any kind which would prevent the Company from filing this Robocall Mitigation Plan. Additionally, in the past 2 years 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. The same is true for any entities affiliated with Company.

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