

HELIX WIRELESS - ROBOCALL MITIGATION PLAN

ABOUT HELIX WIRELESS

Helix Wireless Company formed under the laws of Delaware and is a registered carrier with the FCC. The Company holds the FRN/CORES ID Number: 0028963130 and holds 499 Filer ID Number: 833360.

The Company is a Mobile Virtual Network Operator (MVNO) and provides single line 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 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, and other possible questionable activity is extremely low. Since the service is provisioned on a single cellular device, 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 Company takes given the level of risk it faces are described in this plan.

The Company primary place of business is:

1 Tower Center Blvd
East Brunswick, NJ 08816
855-945-1997
sales@helixwireless.co
www.helixwireless.co

Company Leadership:

CEO:

John Squillace
1 Tower Center Blvd
East Brunswick, NJ 08816
855-945-1997 x 1041
john@helixwireless.co

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COO:

Name: Francis Gallic
1 Tower Center Blvd
East Brunswick, NJ 08816
855-945-1997 x 1042
francis@helixwireless.co

Designated RMD Contact:

Mark Linfield
1 Tower Center Blvd
East Brunswick, NJ 08816
Direct Dial: 855-945-1997 x 1025
mark@helixwireless.co

STIR/SHAKEN Implementation

The Company has no defined implementation related to STIR/SHAKEN and the parameters of 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 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.

ROBOCALL Mitigation Plan

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.

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KNOW YOUR CUSTOMER - SUBSCRIBER KYC & DUE DILIGENCE

The Company has only Post Paid only plans and no subscribers are offered any form of prepaid plan or “pay as you go”. 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.

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 also the Company Acceptable Use Policy.

In each document which the Subscriber either executes individually with the Company (Subscriber Agreement) 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.

KNOW-YOUR CUSTOMER POLICIES - WHOLESALE SERVICES:

Although Helix Wireless is focused on individual clients and also business clients, on a limited basis the Company also supports an MVNO enablement model where it provides the Helix Platform as Software as a Service (“SaaS”) model to organizations who have an FRN, 499 Filer ID, and the appropriate Commercial Mobile Radio Service (“CMRS”) registrations at the individual Public Service or Public Commission levels.

Additionally, Helix Wireless has a detailed wholesale customer contract processes coupled with a rigorous intake and onboarding process. This includes without limitation having the wholesale client provide all requisite exemption forms which are fully vetted, as reviewed and attested to for the validation of the exemption request (tax, Puc related and also FUSF). the Company also has its wholesale clients complete a KYC form

Helix vets the identity of its wholesale customers prior to entering into a contract for MVNO Platform services. As part of this vetting process which is tied into the Company’s Exemption Management policies, Helix collects the wholesale customer’s business name and address, physical location, contact information, jurisdiction of incorporation, federal tax ID, FCC Form 499 identification number and federal Universal Service Fund contributor status, and the nature of the wholesale customer’s business.

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This information may be provided to third- party agencies to determine the credit and/or fraud risk associated with the wholesale customer. If Helix cannot validate the customer based on the initial information provided, Helix may require additional information to validate the customer to seek to ensure it is operating a legitimate business as a reseller. Helix will not provide service if a new wholesale customer's identification cannot be verified or is not in the Robocall Mitigation Database with a current Robocall Mitigation Plan.

Helix's wholesale customers are expected to vet their end user subscribers consistent with the FCC's robocall mitigation rules. Helix, in good faith collaborates with its wholesale customers to exchange relevant information regarding efforts to reduce unlawful robocalls and respond to request from the Industry Traceback Group (ITG), as described within this plan. Helix's wholesale contracts require cooperation with Helix and the Helix Wireless underlying carriers (who control the network and facilities) in responding to ITG traceback requests and prohibit the use of its services to originate unlawful traffic, as reflected in the following contract provisions.

To the extent a wholesale customer is found to have violated its contractual obligations for the reasons noted previously or any other reason, Helix will take action commensurate with the severity of the wholesale customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service.

As mentioned above the Company uses third party tools and analytics to enforce its comprehensive Acceptable Use Policy ("AUP") related to robocalling, fraudulent calling patterns and High Volume Short Duration ("HVSD") calling. If a customer is found to have violated and/or possibly violated the Company policy, the Company has the right to halt, suspend, cease services to the customer immediately.

Helix Wireless Acceptable Use Policy in which it will terminate, halt, cease and/or suspend a business customers traffic (by notifying the Helix provider immediately) if the customer violates any of the company's acceptable use policies and violates any of the company guidelines related to robocalling, telemarketing or use of a customer service which supports it.

PREVENTING ILLEGAL ROBOCALLS

As an MVNO that originates end user calls, Company does not deal with any upstream providers. All calls are routed through its underlying carrier's network upon origination, and the Company has no involvement in any kind related to provisioning. Underlying provider of AT&T Wireless, and in the future will also in the future be using Verizon and other wireless carriers such a T-Mobile. If and when upstream providers are added by the Helix Wireless, the Company shall update their plan.

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Helix Wireless presently has 100% reliance upon the AT&T networks 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.

The Company utilizes a combination of internal tools and third-party solutions and analytics to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks.

UPSTREAM CARRIER/UNDERLYING PROVIDER

As mentioned throughout this Robocall Mitigation Plan Helix Wireless is fully dependent upon the Company's underlying carrier of which underlying carrier owns all facilities, infrastructure, network systems and cellular towers. The company that Helix Wireless uses as its upstream carrier is:

AT&T

Whiteacre Tower, 208 S Akard St

Dallas TX 75202

Main Phone Number: +1 210-821-4105

General Email Address: attcustomercare@att.com

Website: www.att.com

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

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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 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.