

ENTITY NAME	OPERATING MODEL	UNDERLYING PROVIDER
SecureCell LLC	MVNO Reseller	AT&T Mobility LLC

1 Business Overview & Scope

SecureCell LLC ("SecureCell") operates as a Mobile Virtual Network Operator (MVNO) providing retail wireless voice and data communications services to business and consumer subscribers. SecureCell acquires wholesale connectivity and platform enablement to deliver wireless services over the underlying Tier-1 radio access network and IP switching infrastructure of AT&T Mobility LLC ("AT&T").

As an MVNO without direct ownership or operational control over underlying IP network transmission nodes, SecureCell implements a comprehensive dual-layer strategy to combat illegal robocalling: enforcing rigorous subscriber-level "Know Your Customer" (KYC) identity verification and Acceptable Use Policies at service origination, while relying on the network-level call authentication (STIR/SHAKEN framework) and traffic analytics executed by its underlying host network provider, AT&T.

2 Know Your Customer (KYC) & Originating Traffic Controls

SecureCell takes proactive, commercially reasonable steps to ensure that its retail voice services are not leveraged for unlawful telemarketing, fraudulent caller ID spoofing, or illegal automated robocalling. SecureCell enforces the following onboarding, verification, and governance practices across all accounts:

• Identity Verification

SecureCell verifies the identity of all prospective business and consumer subscribers during account provisioning using valid payment credentials, billing address checks, and standard credit and identity verification tools prior to service activation.

• Acceptable Use Policy (AUP) Enforcement

SecureCell's subscriber terms of service explicitly prohibit using network resources for illegal robocalling, automated dialing without prior express written consent, deceptive caller ID spoofing, or any operation violating the Telephone Consumer Protection Act (TCPA) or FCC guidelines.

• Account Remediation & Termination

SecureCell maintains internal investigation procedures for prompt inquiry into reports of suspicious traffic. SecureCell reserves the right to immediately suspend or permanently terminate any subscriber account found originating illegal robocall traffic or violating AUP terms.

3 STIR/SHAKEN & Network-Level Analytics Monitoring

Because SecureCell functions as a reseller utilizing host network infrastructure, call signing, cryptographic identity attestation, and core network traffic monitoring are executed upstream at the network layer: