

ZIRKEL WIRELESS, LLC

**System Security and Integrity (SSI) Plan
Effective as of March __, 2023**

This SSI Plan for Zirkel Wireless, LLC (“Company”) is effective as of the date set forth above and supersedes any previous SSI.

All Company personnel are required to review this SSI upon commencement of employment, and no less frequently than every twelve (12) months thereafter. All pertinent Company personnel shall also review this SSI upon any acquisition or corporate transition.

I. Senior Company Officer Responsible for CALEA

The Company has designated the following individual as its “CALEA Manager:”

Name and Title of Senior Company Officer Responsible for CALEA:

Joshua Nowak

Operations Manager

Job Description of Senior Officer:

(Responsible for facilitating internal preparedness and training to respond to Law Enforcement Agency(ies) request and to ensure this SSI Plan is updated.)

24/7/365 Contact Number(s) for CALEA Manager:

970-871-8500 xt 102

989-482-2431

*See Appendix A for more information.

II. Appropriate Authorization Required

Before enabling Company personnel or law enforcement officials to implement the interception of communications or to access call-identifying information, the Company must first receive “Appropriate Authorization.” Appropriate Authorization includes both (i) Appropriate Legal Authorization, and (ii) Appropriate Carrier Authorization.

“Appropriate Legal Authorization” means: (1) a court order signed by a judge or magistrate authorizing or approving interception of wire or electronic communications; or (2) other authorization, pursuant to 18 U.S.C. 2518(7), or any other relevant federal or state statute.

“Appropriate Carrier Authorization” means: a written finding by the CALEA Manager that the applicable request is received from a law enforcement agency and complies in all respects with applicable law (the “Written Finding”).

III. Records Retention

The Company shall maintain a record of each interception of communications or access to call-identifying information (each, an “Interception Record”) for a period of five (5) years. The CALEA Manager is responsible for ensuring each Interception Record is maintained in both electronic and hard copies. Each Interception Record shall include:

- (i) The telephone number(s) and/or circuit identification numbers involved;
- (ii) The start date and time that the Company enables the interception of communications or access to call identifying information;
- (iii) The identity of the law enforcement officer presenting the authorization;
- (iv) The name and title of the person signing the Appropriate Legal Authorization;
- (v) The type of interception of communications or access to call-identifying information (e.g., pen register, trap and trace, Title III, FISA); and
- (vi) The name of the then-serving CALEA Manager and the Written Finding.

Each Interception Record shall be signed by the then-serving CALEA Manager, who must certify the Interception Record is complete and accurate. The Interception Record must be compiled either contemporaneously with, or no later than 24 hours after the initiation of the interception of the communications or access to call-identifying information.

IV. Reporting of Compromises and Unlawful Electronic Surveillance

In the event any Company personnel become aware of:

- (1) any act of compromise of a lawful interception of communications or access to call-identifying information to unauthorized persons or entities, or
- (2) any act of unlawful electronic surveillance that occurs on Company premises (including through any Company equipment or systems)

such personnel shall *immediately* report such incident to the CALEA Manager.

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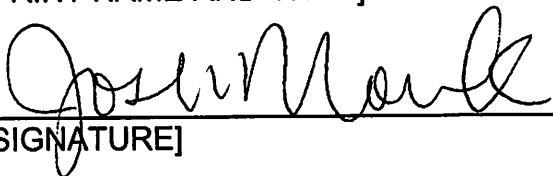
In consultation with the Company's Legal Counsel or his/her designee, the CALEA Manager shall ensure the appropriate affected law enforcement agency is notified as soon as reasonably possible.

* * *

These policies and procedures will remain in effect until notice is provided to the Federal Communications Commission regarding a significant change.

Signed as of March 27, 2023

Josh Nowak Operations Manager
[PRINT NAME AND TITLE]


[SIGNATURE]

APPENDIX A
Designation of Senior Officer Responsible for CALEA Compliance

The Company has designated the following individual as its "CALEA Manager":

Name and Title of Senior Company Officer Responsible for CALEA:

Josh Nowak Operations Manager

Job Description of Senior Officer:

Responsible for facilitating internal preparedness and training to respond to Law Enforcement Agency(ies) request and to ensure this SSI Plan is updated.

24/7/365 Contact Number(s) for CALEA Manager:

NAME: Joshua Nowak

Tel No.: 909-402-2431