

Feedback to TalkTelio on their application to test jammers in South Carolina correctional facility.

This 2nd STA is for time needed for approvals from NTIA. We desire to start as soon as possible. But realize the start date may be too soon for approvals so we will adjust the start days once approvals are granted. Please see our answers below from our 1st STA.

In reviewing your application, we found some inconsistencies and a lack of sufficient information to determine whether the application should be granted. Please clarify or provide the following information in your next application attempt (PDF files may be attached to the form in application process):

1. Indicate whether there will be any outdoor placement of jammer equipment and if so, the placement and technical details for each outdoor antenna (e.g., ERP, bands of operation, antenna characteristics, mounting height, etc.). Please explain how outdoor testing will not affect authorized users within/outside the facility.

TalkTelio Answer: The indoor and outdoor DetectTalk MobileWall (DTMW) devices are identical. TalkTelio invented, designs, builds, installs, and operates the DTMW Devices, the DTMW coding, DTMW SecureStudio operating system, including the DTMW antenna we use. By purposeful design the areas of coverage of every DTMW Device is limited and each DTMW Device is calibrated to power values for each band eliminating only the desired area of coverage. Indoor and outdoor DTMW Devices can use either

- 1) 360° omnidirectional antennas (-1.1 to +2.1 dBi depending on frequency band) maximum distance up to 33 feet in open air or 15-25 feet through solid cement walls and is being used for the Pilot on all 12 indoor DTMW Devices. Or DTMW Devices can use
- 2) a 180° directional antenna (+2.0 to +3.6dBi depending on frequency band) with the maximum distance up to 50 feet in open air or 23-38 feet through solid cement walls and is being used for the Pilot on all 3 outdoor DTMW Devices.
- 3) The third option is a 90° directional antenna (+6dBi to +7dBi depending on frequency band, horizontal beamwidth between 75° and 90° and vertical beamwidth between 55° and 75°) with a maximum distance up to 65 feet in open air and 30-50 feet through solid cement walls and could be used for the 3 outdoor DTMW Devices optional.

The same DTMW Devices are used indoor or outdoor and have a max Peak ERP (+40dBm in e.g. low band) for cellular with optional WiFi 2.4, 5, 6, and/or 7. Every band of operation is individually and fully controlled by each individual DTMW Device. There is no multiplier of power gained regardless of how many DTMW Devices are present. Each DTMW Device works separately. The antenna characteristics are as indicated above. The mounting height for the 3 outdoor devices are 15', 13', 13'. The indoor DTMW Devices are mounted 4-6' above the 1st and 2nd floor levels (the 2nd Floor DTMW Devices are mounted approximately 10'-15' above the 1st Floor level. See pictures. The outdoor testing will not affect authorized users within/outside the facility as explained because the DTMW Devices areas of coverage will never expand beyond the maximum distances

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indicated above and the closest authorized users are approximately a minimum of .9 mile away, or 4,752 feet away from the nearest DTMW Device, or minimum 73 times from the maximum 65 feet away from the nearest DTMW Device using the 90° DTMW antenna, or 158 times the maximum 30 feet away from a DTMW Devices using the 360 DTMW antenna.

All DTMW Devices are fully controlled by TalkTelio, the maximum distances are engineered physically, and each DTMW Device is calibrated to power values for each band eliminating only the desired area of coverage: Outdoor open air maximum up to 65 feet using the DTMW 90° antennas, up to 50 feet using the DTMW 180° degree antennas or up to maximum of 30 feet using the DTMW 360° antenna. At every Prison Site and every DTMW Device Prison Site location TalkTelio safely and purposely locates every DTMW Device to never operate outside the prison inside parameters guaranteeing never to affect authorized users within/outside the facility.

Viewing picture below: TalkTelio DetectTalk MobileWall (DTMW) SCDC Broad River CI Test Areas of Coverage:

8 Red Circles indicate the Measurement Test locations inside the Site perimeter.

Additional measurement locations will be made inside and outside the 3 red squares A-B-C areas of coverage and outside the Site perimeter. 12 indoor DTMW Devices will operate inside the building of the red square A, and 1 outside device in each of the 3 red areas of coverage A-B-C.

The 3 red squares indicate the approximate maximum DTMW area of coverage distances. Indoor DTMW Devices up to 30 Feet 360°. Outdoor DTMW Devices up to 65 Feet 90°.

The public have zero access anywhere near or around the secure SCDC Broad River CI prison Site. DTMW has successfully been deployed at other sites including in urban areas with zero impact to the public and carriers. DTMW has over 2 trillion monitoring events with zero issues. Broad River CI has an extensive buffer zone surrounding the institution, with the closest publicly accessible area approximately .9 miles from the DTMW Pilot test, the risk of impact is not expected. The outdoor DTMW Devices are below 16 feet.

The DTMW Pilot Test periods are between 8:00 am and 5 pm. A Stop buzzer Contact number is provided to all parties at all times during the DTMW Pilot Test. All technical characteristics have been provided, including each band of operation (as requested in the OET STA application - e.g., beam width 30'/90', azimuth 360°/180°, elevation in/outdoor max 15'/13'/13', gain +0.5dBi, max power 10W, nothing transmitted, etc.). The FCC licensees have provided consent and are a part of the Stop buzzer parties. The primary parties include the FCC, TalkTelio, SCDC, CTIA, NTIA, VT-ARC, AT&T, T-Mobile, and Verizon.

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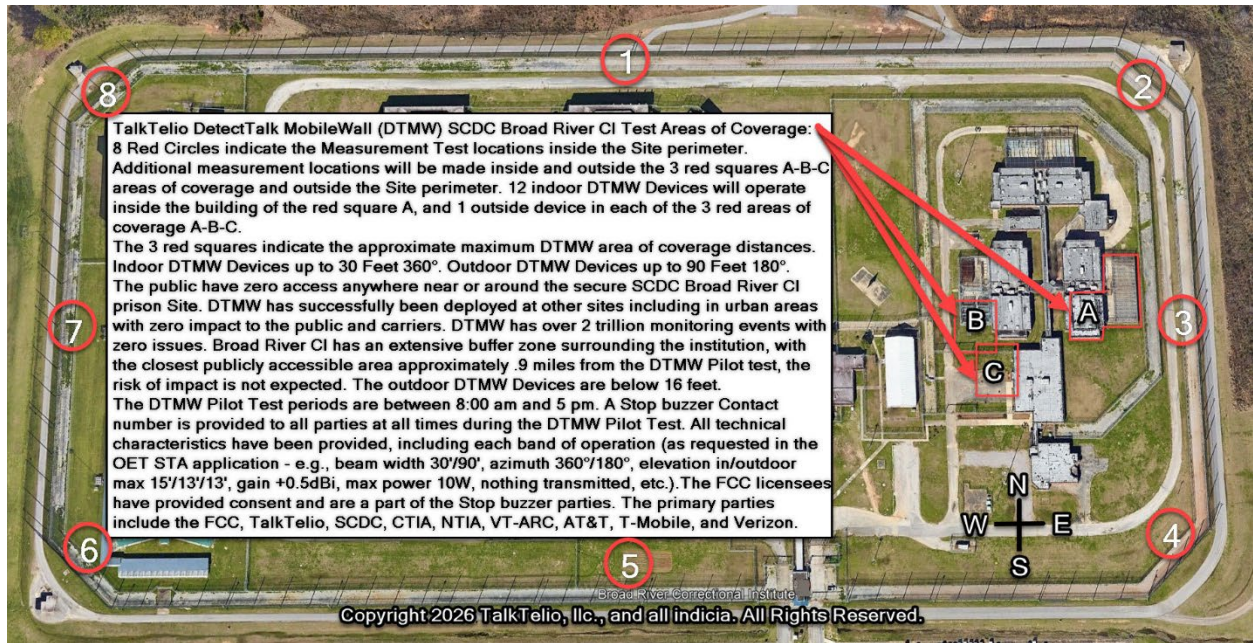


Figure 1



Figure 2

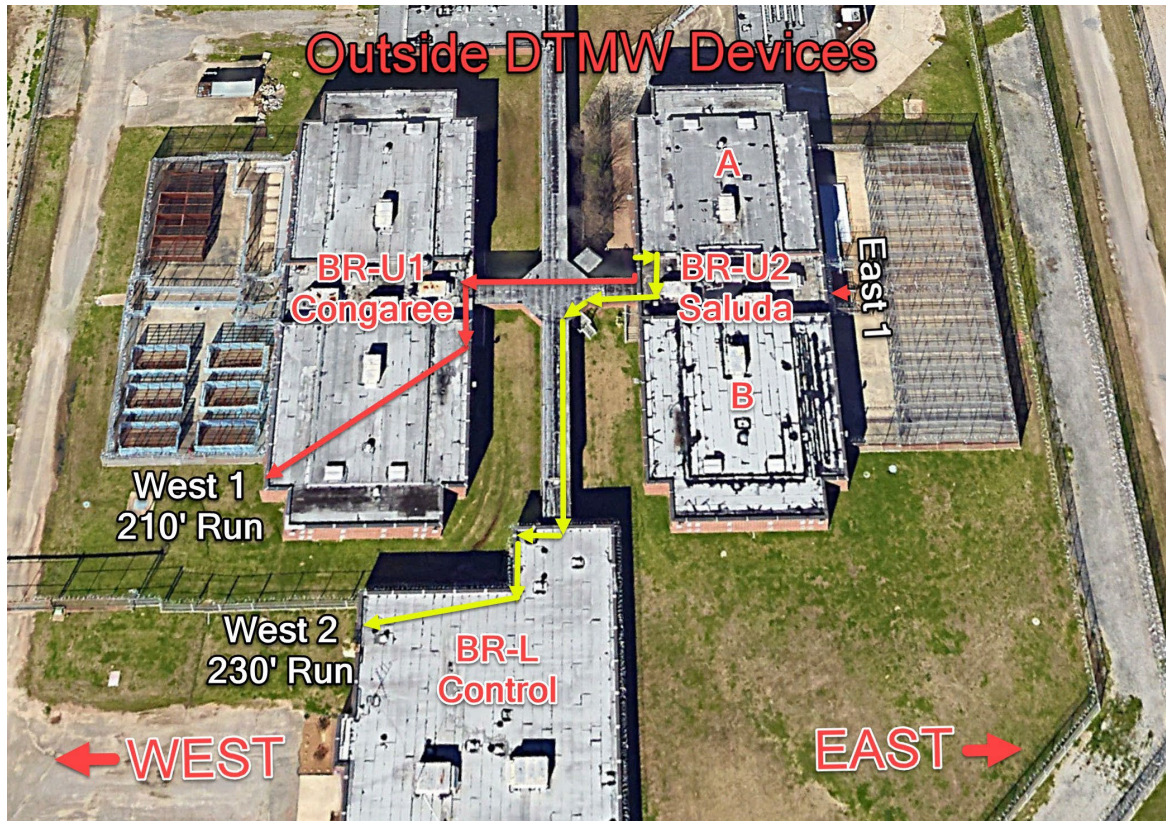


Figure 3



Figure 4

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Figure 5

2. Please provide more information on the extent of the indoor testing. Will it be throughout the complex or in limited housing units or other deployment details? A diagram of antenna locations would be helpful per building if known. Provide details on number of transmitters and relevant technical parameters.

TalkTelio Answer: Comprehensive measurements throughout the indoor and outdoor areas until where the areas of coverage are not affected. Measurements will be made indoors near the 12 indoor DTMW devices (Green Squares) and in the open areas of the U2-Building, then outdoors. First with DTMW OFF measurements will be made to determine the baseline energy levels for each frequency, then repeated with DTMW ON. Also see pictures in Answer 1 above.

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TalkTelio confidential and proprietary not for public to be redacted.

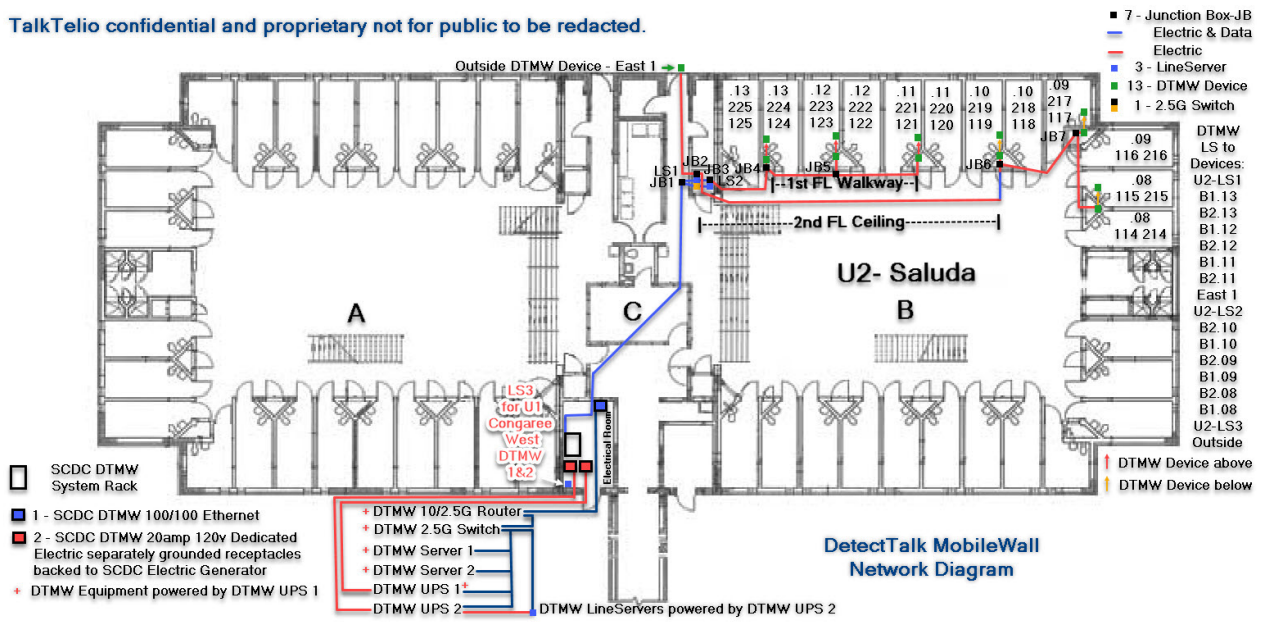


Figure 6

3. Please provide an aerial photo of the facility to reflect its proximity to any entities that could be impacted by the tests (e.g., public roads, homes, businesses, schools, parks....). it would be helpful in this description to know which building the jamming operations are occurring and whether there are portions of the complex where authorized users will continue to be able to use their phones.

- a. Please provide a narrative description of how you will verify that authorized users are not impacted by the jammer tests.

TalkTelio Answer: See pictures and narratives answers in 1 above. Each DTMW Device is calibrated to power values for each band eliminating only the desired area of coverage and physically engineered for a maximum area of coverage up to 30 feet indoors or 15-20 feet through solid cement walls and up to 65 feet outdoors. The closest authorized user are 0.9 miles away or 4,752 feet away or 52 times away from the maximum distance from an outdoor DTMW Device or 158 times away from the maximum distance from an indoor DTMW Devices. As a result, there will be zero effect on all authorized users.

- b. Please provide an explanation on how you can ensure that the location and maximum power levels of the transmitter(s) make it impractical for handsets and wireless networks outside the perimeter of the facility to be affected.

TalkTelio Answer: See pictures and narrative answers in 1 above. Each DTMW Device is calibrated to power values for each band eliminating only the desired area of coverage and physically engineered for a maximum area of coverage up to 30 feet indoors or 15-20 feet through solid cement walls and up to 65 feet outdoors.

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The closest authorized user are 0.9 miles away or 4,752 feet away or 52 times away from the maximum distance from an outdoor DTMW Device or 158 times away from the maximum distance from an indoor DTMW Devices. As a result, the maximum power levels of the transmitters make it impractical for handsets and wireless networks outside the perimeter of the facility and there will be zero effect on all authorized users.

4. For each band of operation:

a. Identify the band;

TalkTelio Answer: Band of Operation chart:

Action	Frequency	Station Class	Max. Output Power before Antenna	Mean Peak	Frequency tolerance (+/-	Emission Designator
New	617.00000000-652.00000000	FX	+40dBm	P	0,5	1M00NXN
New	717.00000000-803.00000000	FX	+40dBm	P	0,5	1M00NXN
New	854.00000000-894.00000000	FX	+40dBm	P	0,5	1M00NXN
New	1910.00000000-2020.00000000	FX	+39dBm	P	0,5	1M00NXN
New	2120.00000000-2200.00000000	FX	+37dBm	P	0,5	1M00NXN
New	2300.00000000-2400.00000000	FX	+37dBm	P	0,5	1M00NXN
New	2400.00000000-2482.00000000	FX	+37dBm	P	0,5	1M00NXN
New	2496.00000000-2690.00000000	FX	+37dBm	P	0,5	1M00NXN
New	3450.00000000-3980.00000000	FX	+29dBm	P	0,5	1M00NXN
Future	3450.00000000-3980.00000000	FX	+37dBm	P	0,5	1M00NXN
New	5150.00000000-5925.00000000	FX	+25dBm	P	0,5	1M00NXN
New	5925.00000000-7125.00000000	FX	+25dBm	P	0,5	1M00NXN
Future	5925.00000000-7125.00000000	FX	+33dBm	P	0,5	1M00NXN
Antenna Gain						
MW Omnidirectional			-1.1dBi to +2.1dBi depending on frequency band			
MW 180° directional antenna			+2dBi to +3.6dBi depending on frequency band			
MW 90° directional antenna			+6dBi to +7dBi depending on frequency band			

Figure 7

b. Identify the maximum power and bandwidth used;

TalkTelio Answer: See Band of Operation chart above 4.a.

c. Identify FCC licensees within a relevant distance of the prison (for the tech parameters proposed) and demonstrate that the FCC licensee for the band(s) tested is part of the test and/or consents to the test.

TalkTelio Answer: Confirmed with AT&T, T-Mobile, and Verizon, TalkTelio received **T-Mobile consent letter. AT&T and Verizon.**

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5. Please explain all measures taken to protect all legitimate operations within and outside of the facility. Will you be testing for impacts on adjacent channel operations? Will you be measuring impact on radios used by prison officials? Are the jammers meeting OOB limits for each of the bands being jammed?

TalkTelio Answer: Yes. Each DTMW Device automatically and concurrently monitors, detects, locates, and eliminates all attempted use of each frequency cellular, Wi-Fi, and Bluetooth band and each band is separately fully controlled by TalkTelio. Each DTMW Device monitors real time the noise energy of each band and eliminates each individual band upon any attempted use of each cellular band, including optionally by DTMW Device as desired by the prison W-Fi 2.4, 5, 6, and 7 and Bluetooth. Facility staff are not permitted to use cell phones at the prisons. DTMW monitoring, detection, and elimination is strictly limited to only cellular, Wi-Fi, and Bluetooth frequencies, with minimal bleeding technically necessary for blocking the complete band to any other spectrum frequencies. DTMW has had over 2 Trillion monitoring events since 2015 in prison sites with minimal bleeding technically necessary for blocking the complete band, zero affect to carrier networks, zero impact on radios used by prison officials, zero impact on authorized carriers outside the areas of coverage, and zero 911 issues. The DTMW elimination meets the OOB limits for each of the bands being eliminated.

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Specific feedback to your initial application.

1. Please answer the questions left blank on the form.
2. Please provide more detail on the antennas used. You initially say there will be both omnidirectional and directional antennas, but later indicate there will not be directional antennas. What is the gain of the antennas?

TalkTelio Answer:

1) 360° omnidirectional antennas (-1.1 to +2.1 dBi depending on frequency band) on all 12 indoor DTMW Devices.

On the 3 outdoor DTMW Devices optionally:

2) 180° directional antenna (+2.0 to +3.6dBi depending on frequency band) or

3) 90° directional antenna (+6dBi to +7dBi depending on frequency band, horizontal beamwidth between 75° and 90° and vertical beamwidth between 55° and 75°)

3. Your power is reflected as output power and ERP, but the ERP is much lower than the output power, can you explain the configuration of the setup, are these number flipped or is there significant losses in the configuration because the antenna is mounted to radiate through a concrete wall or something else?

TalkTelio Answer: Please see the band chart:

Action	Frequency	Station Class	Max. Output Power before Antenna	Mean Peak	Frequency tolerance (+/-	Emission Designator
New	617.00000000-652.00000000	FX	+40dBm	P	0,5	1M00NXN
New	717.00000000-803.00000000	FX	+40dBm	P	0,5	1M00NXN
New	854.00000000-894.00000000	FX	+40dBm	P	0,5	1M00NXN
New	1910.00000000-2020.00000000	FX	+39dBm	P	0,5	1M00NXN
New	2120.00000000-2200.00000000	FX	+37dBm	P	0,5	1M00NXN
New	2300.00000000-2400.00000000	FX	+37dBm	P	0,5	1M00NXN
New	2400.00000000-2482.00000000	FX	+37dBm	P	0,5	1M00NXN
New	2496.00000000-2690.00000000	FX	+37dBm	P	0,5	1M00NXN
New	3450.00000000-3980.00000000	FX	+29dBm	P	0,5	1M00NXN
Future	3450.00000000-3980.00000000	FX	+37dBm	P	0,5	1M00NXN
New	5150.00000000-5925.00000000	FX	+25dBm	P	0,5	1M00NXN
New	5925.00000000-7125.00000000	FX	+25dBm	P	0,5	1M00NXN
Future	5925.00000000-7125.00000000	FX	+33dBm	P	0,5	1M00NXN
	Antenna Gain					
	MW Omnidirectional		-1.1dBi to +2.1dBi depending on frequency band			
	MW 180° directional antenna		+2dBi to +3.6dBi depending on frequency band			
	MW 90° directional antenna		+6dBi to +7dBi depending on frequency band			

The max. output power at antenna connector is given and the dBi of each type of antenna.

South Carolina Department of Corrections (SCDC) Broad River Corrections Institute (Broad River CI)

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4. For the power, you indicate a 1 megahertz wide emission designator. Does that mean the radiated power in column three is per MHz?

TalkTelio Answer:

DMTW sends a beam with a bandwidth of 1MHz with a power up to the named maximum and sweeps it through each band with high speed (1MHz beam sweep thru band). So the named value is a peak power, not the average in the band. The beam is switched off and switches to another band again, when more bands are covered at the same time with each DTMW Device.

5. Please provide a description of your jamming signal sufficient for us to understand how jamming is performed and how the power is used. Is it a sweeping signal across the band at a high rate, is it a random noise mask customized to be above the RSSI of base station signals in the targeted area? What are the jamming signal characteristics?

TalkTelio Answer:

Yes, it's a sweeping random noise signal across the band at a high rate and it's above the RSSI of each base station's signal in the targeted area. DMTW sends a beam with a bandwidth of 1MHz in CW.

6. Please explain the reduced transmit power requirement for higher frequencies considering their unfavorable propagation. This seems counter intuitive, please explain your power choices per band. Are you simply providing the maximum capabilities of the transmitter generally and you only intend to use a portion of the power? Please be more descriptive of the power used per antenna in each area.

TalkTelio Answer:

The high power is used to efficiently eliminate old high power standards (e.g. GSM) and to eliminate extremely error correcting systems like 5G standalone. The power can be adapted freely to the needed values at each given point of installation of the DTMW devices. In most cases power +30dBm is sufficient to eliminate effectively.

Frequency differences: The unfavorable propagation works in both ways: The base station signals come from much farer away and need to overcome more than one concrete walls. This leads to a big attenuation of the received signal. DMTW is very near (only some feet away) to the illegal device we need to eliminate effectively, so the needed power is not higher. WLAN base stations are much weaker than mobile base station, so a smaller elimination power is sufficient. The "future" band power values are describing DTMW Device's EL2P module inside the DMTW is for higher frequencies to cover outdoor areas better (in means of bigger coverage) for 3-4 GHz standalone 5G and outdoor 5 GHz WLAN attacks.

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7. Your radius of operation says “0.02” without any units. Please describe in more detail the scope of your jamming deployment, what areas are considered the targeted jamming area and what areas are considered protected areas and the criteria that will be used to make a determination that protected areas are protected.

TalkTelio Answer:

The typical free air coverage of DTMW is 33 feet in a circle, concrete wall reduces the range to 15-25 feet. Overlapping DTMW coverages of adjacent DTMW devices, also on different floors, ensure secure elimination for all selected bands. The power of the bands used will be programmed to values that communication in protected areas will not be affected.

8. Please provide the hours of operation during the test period and the “hot” number that will be provided to carriers.

TalkTelio Answer: 8:00am to 5:00pm EST. David Miller, Greg Muncy, Abbie Forrest, (941) 955-8881.

Further, our engineering office asked to share the following feedback:

1. The coordinates listed on their application are incorrect. A latitude at 30 degrees North has you in the Atlantic Ocean off the coast of Jacksonville, FL. Do you mean 34 degrees North? Please correct. **TalkTelio Answer:** Corrected.
2. In addition to the carrier bands, the application includes the Wi-Fi bands
 - a. 2.4 GHz band (but not the last .5 megahertz)
 - b. 5150-5925 MHz
 - i. This includes the U-NII-2B (5350-5470 MHz) band. Wi-Fi does not operate in that spectrum. Why is this band included?
TalkTelio Answer: We will correct.
 - ii. This includes the 5895-5925 MHz C-V2X band. Why is this band included?
TalkTelio Answer: We will correct.
 - iii. Please note 5250-5925 MHz is a shared federal/non-federal band, so this application will need to be coordinated with NTIA.
TalkTelio Answer: We will not test this band if NTIA does not approve.
 - iv. Also note that inclusion of U-NII-2B, especially if outdoors, may be a non-starter. NTIA is likely ask to notch out that band.
TalkTelio Answer: We will not test this area is NTIA ask to notch out that band.
 - v. 5150-5250 MHz note this band requires FAA pre-coordination. See June 19 email to Abbie Forrest noting this requirement. As stated in that e-mail, this pre-coordination is required to process the application.

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TalkTelio Answer: We will not test this band if FAA is not pre-coordinated, most likely not due to the Pilot timeline.

- c. Please note that NTIA coordination for an STA is likely to take an additional approximately 7 calendar days.

TalkTelio Answer: TalkTelio may not test any “NTIA” required bands due to the Pilot Timeline.

- 3. The application includes 2300-2400 MHz, we presume this is to capture the WCS bands.

- a. By including the 2360-2395 MHz band, you will trigger AFTRCC coordination for the 2360-2395 MHz AMT band, as well as NTIA coordination.

TalkTelio Answer: We will notch out 2360-2395 MHz band if not coordinated with AFTRCC and NTIA.

- i. See June 19 email to Abbie Forrest noting this requirement. As stated in that e-mail, this pre-coordination is required to process the application.
 - b. This band also includes the SDARS band.

TalkTelio Answer: This is within the Band 40 – 5G Used by Verizon.

- c. Why is this expansive band included and not limited to just 2345-2360 MHz WCS downlink band?

TalkTelio Answer: This Band 30 - 4G-LTE is traditionally all we eliminate, until as we understand, Verizon now has 2300-2400 band 40 for Cellular.

- 4. 717-803 MHz. Note, the lower 700 MHz band begins at 716 MHz.

- a. This includes the FirstNet spectrum which includes Narrowband (i.e., mission-critical voice, non-cellular type transmissions) in 769-775 MHz and 799-805 MHz bands.

- i. Do you have specific mitigation plans to protect those mission-critical communications?

TalkTelio Answer: The restricted prison areas of coverage will not effect the mission critical communications. The essence of elimination of contraband mobile communications devices requires DTMW elimination of cellular carrier frequencies that are used legally and illegally (such as, by drug cartels, etc.). Inside the prison perimeters the carriers’ frequencies are used by unauthorized users (such as, inmates, detainees, residents, etc.) to coordinate killings, beatings, riots, hits on staff, external judges, attorneys, victims of crime, witnesses, released inmates, their families, the public, etc. DTMW will monitor the UL frequencies and the bands that include the use of UL and DL throughout the respective bands. As Drug cartels (unknow to the government or law enforcement) use the range of cellular frequencies DTMW automatic monitoring and detection of such frequency attempts ensures instant and automatic elimination of these bands in such circumstances.

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- b. 776-778 MHz is uplink as well as the FirstNet 788-805 MHz band.

TalkTelio Answer: We monitor the individual “700” uplinks and eliminate to ensure no CMCD use.

- c. Please also note you asked to jam up to 803 MHz, but the band actually goes up to 805 MHz.

TalkTelio Answer: We will increase to 805 MHz, we may stay with 803 MHz during the pilot but will add to 805 MHz.

5. 1910-2020 MHz

- a. 1910-1920 MHz (PCS G and H blocks) are uplink spectrum. Why do you wish to operate here?

TalkTelio Answer: 1930-1995 MHz is Band 2, we expanded to ensure complete elimination.

- b. 1920-1930 MHz is unlicensed PCS. Is this intended to be part of the test?

TalkTelio Answer: We can exclude from the test.

6. 3450-3550 MHz band. Please note that this location may fall within one of the Cooperative Planning Areas, so NTIA coordination may be necessary for this band.

TalkTelio Answer: TalkTelio may not test any “NTIA” required bands due to the Pilot Timeline.