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Building the Future of Finance: How the CLARITY Act Unlocks Innovation

Before the Subcommittee on Digital Assets, Financial Technology, and Artificial Technology of the U.S. House Committee on Financial Services

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I. Introduction

Chairman Hill, Ranking Member Waters, and distinguished Members of the Committee, thank you for the opportunity to testify today on the real-world benefits of blockchain technology and the importance of regulatory clarity for digital assets.

My name is Sarah Aberg. I am the Chief Legal Officer of Nova Labs, Inc., the company that created and continues to support the Helium Network, the world's largest decentralized wireless infrastructure network.¹ Before joining Nova Labs, I spent over fourteen years in private practice at major law firms, where my work focused on financial enforcement and regulation, with an emphasis on U.S. securities law. I hold a J.D. from the Benjamin N. Cardozo School of Law and am licensed to practice in New York. Nova Labs is a Delaware corporation and a fully remote, U.S.-based company.

I want to explain what the Helium Network does, the public benefits it delivers, and why the passage of the CLARITY Act is necessary to provide the regulatory framework that allows this kind of innovation to continue and scale in the United States.

Nova Labs holds telecommunications licenses in all fifty states and a Federal Communications Commission Section 214 authorization for interstate and international telecommunications services. The Helium Network currently encompasses over 140,000 active hotspots across the United States and internationally, providing carrier-grade Wi-Fi offload services to several major U.S. carriers including T-Mobile and AT&T, and serving millions of daily users.² The Helium Network has been functional since 2021.

I want to be direct about what Helium is: it is physical telecommunications infrastructure. Wireless access points, deployed in communities across America, that provide real wireless coverage to real people every day. Blockchain is the technology that makes the network function. Cryptocurrency is the incentive mechanism that drives its growth.

I also wish to express my support for H. Res. 111, and its pursuit of a regulatory approach that allows innovation to flourish while addressing legitimate risks posed by blockchain technologies and digital assets. I support the passage of the CLARITY Act.

¹ See Andreessen Horowitz, recognizing Helium as the "first at-scale decentralized telecom network" (available at <https://a16z.com/announcement/investing-in-helium/>).

² See Helium Network statistics at <https://world.helium.com/en/network/mobile>.

II. The Helium Network

A. How the Network Works

The Helium Network provides wireless broadband coverage through a distributed base of community-deployed hotspots. Individuals, businesses, and property operators deploy enterprise-grade Wi-Fi access points that connect to existing internet backhaul infrastructure, whether fiber, cable, or satellite. When subscribers of participating carriers enter the range of a Helium hotspot, their devices automatically and seamlessly connect, offloading data traffic from congested cellular towers or providing coverage where cellular signals are weak or unavailable.³ Carriers pay the Helium Network for offload service. Subscribers experience uninterrupted connectivity without any manual intervention or new login credentials.⁴

B. How Blockchain Makes It Work

Coordinating a network of over 140,000 independently owned and operated access points, deployed by thousands of individuals and businesses who do not know each other and have no contractual relationship with one another, presents an obvious problem: how do you verify that each access point is actually providing the coverage and quality of service it claims to provide? And how do you compensate each deployer fairly, in real time, based on actual performance?

The Helium Network uses blockchain technology to solve both problems. The blockchain layer secures, prioritizes, and measures data transmission across the network.⁵ It enables trustless verification of coverage and data transfer without relying on a centralized intermediary. Every data session is recorded, measured, and verified on-chain. This is what makes it possible for a distributed network of independent deployers to function as a single, carrier-grade wireless service that major national wireless providers are willing to accept as a trusted extension of their own networks for millions of subscribers every day.

C. The Deployer Incentive

When a hotspot transfers data for a carrier subscriber, the Helium protocol automatically issues token rewards in the form of HNT, the native token of the Helium Network, based on the volume of data transferred and the quality of service provided.⁶ These HNT distributions are programmatic, governed by the protocol's rules rather than by any discretionary human decision, and automatic, executed by smart contracts in response to verified network activity. They are compensation for measurable service delivery.

This incentive mechanism is what drives network growth. Over 140,000 mobile hotspots have been deployed across the United States and internationally, not by a telecommunications company spending billions on centralized tower infrastructure, but by individuals and businesses who chose to participate because the deployer incentive made it worthwhile. Nova Labs does not

³ Helium Network documentation (available at <https://docs.helium.com>).

⁴ Id.; see also Wi-Fi Alliance, Passpoint Specification (2023) (available at <https://www.wi-fi.org/discover-wi-fi/passpoint>).

⁵ Helium Network documentation (available at <https://docs.helium.com>).

⁶ See Helium Network, HIP documentation (available at <https://github.com/helium/HIP>).

hold a controlling share of the HNT token supply, nor has it ever. The tokens are functional: their value is derived from the wireless coverage the network provides, not from speculative trading.

D. Proven at Scale

The Helium Network has been tested at production scale under demanding real-world conditions.⁷

- During Hurricane Helene in September 2024, 80% of cell towers in the hardest-hit regions of western North Carolina were offline, leaving residents and responders without communication tools. Helium deployed portable hotspot beacons using Starlink backhaul, reconnecting tens of thousands of devices in disaster-stricken areas. The Land of Sky Regional Council deployed a beacon at Jackson Park in Hendersonville, North Carolina, providing essential connectivity to residents and first responders during recovery efforts. Separately, Team Rubicon, a nonprofit founded and operated by U.S. veterans, incorporated Helium beacons into mobile recovery units, establishing Wi-Fi networks in neighborhoods devastated by the storm.⁸
- In Redondo Beach, California, the city's waterfront pier district, which draws more than one million visitors annually, had near-zero cellular coverage for years because high-rise condominiums between the waterfront and nearby carrier towers blocked signals before they reached sea level. By enabling Helium carrier offload on the city's existing Wi-Fi infrastructure, the city resolved the dead zone with no new hardware and no capital expenditure and is now connecting more than 2,000 daily users from major U.S. carriers. The city has since expanded the service to the police department basement, another location where cellular signals could not penetrate.⁹
- During this year's Mardi Gras in New Orleans, community-deployed Helium infrastructure absorbed a 550% cellular traffic surge, serving over 100,000 additional mobile users through seamless handoff from congested carrier networks.¹⁰
- In San Jose during Super Bowl LX weekend, the city saw 32% more phone connections on game day, sustained through community-deployed Wi-Fi infrastructure with zero centralized coordination required.¹¹
- In Golden, Colorado, a town festival in February drove cellular traffic to 300% of baseline with zero service outages, absorbed by locally deployed Helium hotspots.¹²

⁷ See Helium Mobile's Hotspot Beacon Program Provides Lifeline Connectivity in Disaster Zones, Webwire (January 15, 2025), available at <https://www.webwire.com/ViewPressRel.asp?aId=332627>.

⁸ See <https://www.webwire.com/ViewPressRel.asp?aId=332627>.

⁹ See <https://www.helium.com/blog/redondobeachhelium>.

¹⁰ See <https://www.helium.com/blog/fat-tuesday-thin-signal>.

¹¹ See <https://www.helium.com/blog/big-game-weekend-powered-by-the-people>.

¹² See <https://www.helium.com/blog/hosting-a-mid-sized-festival-with-70-000-people-you%E2%80%99re-gonna-need-helium-for-that>.

In each case, community-deployed or city-enabled Wi-Fi offload delivered connectivity that the cellular network alone could not, whether due to congestion, infrastructure failure, or signal obstruction.

III. What the Helium Network Makes Possible

The Helium Network's utility extends well beyond commercial carrier offload. The same decentralized wireless infrastructure that absorbs traffic surges and extends carrier coverage also creates opportunities to address two significant public policy challenges: gaps in emergency communications and the digital divide in underserved communities. These are not hypothetical use cases. They are active initiatives that demonstrate the breadth of public utility that a decentralized wireless network can deliver.

A. Emergency Communications and Network Interoperability

Every year, millions of wireless 911 calls in the United States are routed to the wrong emergency dispatch center. Before the FCC adopted its Location-Based Routing Rule in January 2024, the National Emergency Number Association estimated that approximately 23 million wireless 911 calls were misrouted annually, consuming over 200,000 hours per year of 911 professional labor.¹³ These misroutes occur because legacy routing systems assign calls based on cell tower association rather than actual caller location.

The FCC's Location-Based Routing Rule improved this for cellular networks, but it has a structural limitation. NIST research has found that modern building materials attenuate cellular signals by 25 to 50 dB, reducing usable signal power by 300 times or more.¹⁴ When indoor signal conditions prevent accurate device location, carriers fall back to the same tower-based routing the rule was designed to replace.¹⁵ In some jurisdictions, 911 misroute rates with legacy tower-based routing reached 20 to 50 percent along PSAP boundaries.¹⁶ The FCC has estimated that improved indoor location accuracy alone would save over 10,000 lives annually.¹⁷ Yet according

¹³ NENA Comments, PS Docket No. 18-64, at 2 (rec. July 11, 2022), cited in FCC, Notice of Proposed Rulemaking, Location-Based Routing for Wireless 911 Calls, FCC 22-96, 88 FR 2565, 2567 (Jan. 17, 2023) (available at <https://www.federalregister.gov/d/2023-00519>); see also FCC, Report and Order, PS Docket No. 18-64, FCC 24-4, at n.12 (Jan. 25, 2024) (available at <https://docs.fcc.gov/public/attachments/FCC-24-4A1.pdf>).

¹⁴ NIST Technical Note 1540, *Propagation and Detection of Radio Signals Before, During, and After the Implosion of a Large Building* (May 2005) (available at <https://www.nist.gov/publications/propagation-and-detection-radio-signals-during-and-after-implosion-13-story-apartment>); NIST IR 6055, *Electromagnetic Signal Attenuation in Construction Materials* (1997) (available at <https://www.nist.gov/publications/electromagnetic-signal-attenuation-construction-materials>).

¹⁵ Id.; FCC Report and Order, PS Docket No. 18-64, at para. 30.

¹⁶ FCC, Report and Order, FCC 24-4, PS Docket No. 18-64, at n.16 (adopted Jan. 25, 2024) (citing Intrado Life & Safety, Inc., Public Notice Comments at 4-5 (rec. July 11, 2022) (reporting 20-50% misroute rates along PSAP boundaries in Palm Beach County, Florida) (available at <https://docs.fcc.gov/public/attachments/FCC-24-4A1.pdf>).

¹⁷ FCC, Report and Order, PS Docket No. 07-114, at para. 76 (2015) (available at <https://docs.fcc.gov/public/attachments/FCC-15-9A1.pdf>).

to the FCC's most recent data, less than one percent of wireless 911 calls deliver a "dispatchable location," meaning the actual street address, floor, and unit of the caller.¹⁸

These failures are concentrated in the environments where accurate location matters most. When a resident on the fourteenth floor of a high-rise apartment building calls 911 during a medical emergency, the dispatcher needs to know not just which building, but which floor and which unit. When a domestic violence victim calls from inside a concrete-walled structure, the difference between reaching the correct dispatch center and being transferred after a one-minute delay can determine the outcome. When a worker is injured on a factory floor, first responders need a location precise enough to reach the right entrance of a multi-building facility. In each case, the caller is indoors, where cellular signals are weakest and tower-based routing is least accurate. The FCC itself has recognized this gap: in its March 2025 Sixth Further Notice of Proposed Rulemaking on wireless location accuracy, the Commission found that the vertical location information PSAPs currently receive "is frequently not actionable due to lack of precision and/or the information being delivered in a format that is not easily usable."¹⁹

Wi-Fi offload technology, including the technology the Helium Network deploys, can address both the location accuracy and indoor connectivity problems that current regulations leave unresolved. A Wi-Fi access point covers a radius of approximately 150 feet, compared to a one-to-three mile radius for a cellular macro tower in urban areas.²⁰ Using existing Next Generation 911 standards, a carrier's network core can query a Wi-Fi offload operator's Location Information Server during a live 911 call, retrieving the access point's civic and geodetic location, including, where the operator provisions sub-address data, floor and unit information for delivery of a dispatchable location.²¹ This approach provides significantly more precise, "dispatchable" location data and an alternative communications path when the cellular signal is degraded or unavailable indoors.²²

Nova Labs authored a detailed white paper on this subject, which I respectfully offer for the Committee's record. The paper, titled "Dropped Calls, Lost Time, Lost Lives: How Network Interoperability Can Save Lives," describes the technical architecture, addresses known limitations, and sets forth specific, technology-neutral policy recommendations for expanding federal interoperability and location-based routing regulations to include Wi-Fi Calling.²³ The

¹⁸ FCC, Sixth Further Notice of Proposed Rulemaking, PS Docket Nos. 07-114 and 18-64 (March 2025) (available at <https://docs.fcc.gov/public/attachments/FCC-25-22A1.pdf>).

¹⁹ FCC, Wireless E911 Location Accuracy Requirements, Sixth Further Notice of Proposed Rulemaking, FCC 25-22, para. 20 (adopted Mar. 27, 2025) (available at <https://www.fcc.gov/document/fcc-proposes-improvements-wireless-e911-location-accuracy-rules>).

²⁰ See FCC Report and Order, PS Docket No. 18-64, at paras. 3-7 (available at <https://docs.fcc.gov/public/attachments/FCC-24-4A1.pdf>); standard RF engineering specifications for macro cell and Wi-Fi AP coverage radii.

²¹ See NENA i3 Standard for Next Generation 911, NENA-STA-010.3e-2021 (available at <https://www.nena.org/page/standards>); 3GPP TS 23.167 (Machine-Type and other Mobile Data Applications Communications Enhancements) (available at <https://www.3gpp.org/dynareport/23167.htm>).

²² *Id.*

²³ Dropped Calls, Lost Time, Lost Lives: How Network Interoperability Can Save Lives (2026), appended hereto as Appendix A.

policy recommendations would apply to any network architecture capable of meeting the proposed interoperability and location-accuracy standards; they are not Helium-specific.

B. Bridging the Digital Divide in Underserved Communities

Between 20 and 25 percent of the "digital divide" in the United States is concentrated in affordable multi-dwelling units.²⁴ Broadband access in these communities is a function of both physical accessibility and affordability, and traditional solutions, such as fiber-to-the-unit retrofits and carrier tower development, carry capital costs that are often prohibitive for public housing authorities.

The Helium Foundation, a Delaware 501(c)(4) non-profit organization associated with the Helium Network, is pursuing initiatives with public housing authorities to pilot the deployment of decentralized broadband in affordable multi-dwelling units using the Helium Network. The model has three structural cost advantages. First, the decentralized deployment model replaces the traditional bulk ISP service agreement for in-building connectivity. Rather than negotiating a per-unit contract with an internet service provider to wire and serve each apartment, the PHA, or community deployers working with the PHA, install Wi-Fi access points connected to the building's existing internet backhaul, and the Helium Network provides the connectivity layer to carrier subscribers automatically. Second, the capital cost per unit is lower than traditional fiber-to-the-unit retrofits because the network leverages Wi-Fi access points rather than requiring full rewiring of aging building infrastructure. Third, deployers earn HNT token rewards based on actual data usage, creating a revenue stream from carrier offload traffic that can offset ongoing maintenance and operating costs.

This model aligns with multiple existing federal funding mechanisms. The \$42.45 billion Broadband Equity, Access, and Deployment ("BEAD") Program, funded by the Infrastructure Investment and Jobs Act, explicitly includes "installing internet and Wi-Fi service in multi-unit residential buildings" as an eligible use.²⁵ HUD's ConnectHomeUSA program, active in over 100 communities nationwide, has connected over 72,500 households to affordable internet and distributed more than 30,000 digital devices.²⁶ The Public Housing Capital Fund provides annual formula-based grants to public housing authorities, and HUD guidance confirms that Capital Fund grants may be used for broadband-related capital expenditures in residents' homes, including installation of Wi-Fi and mesh network equipment.²⁷

Helium is currently exploring pilot programs to bring this connectivity model to public housing in New York and California. We have met with the Deputy Executive Director of the Housing Authority of the County of San Bernardino, California, and are exploring the feasibility of a pilot

²⁴ National Association of Housing and Redevelopment Officials (NAHRO) (available at <https://www.nahro.org>).

²⁵ Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, § 60102 (2021) (codified at 47 U.S.C. § 1702; available at <https://www.law.cornell.edu/uscode/text/47/1702>); NTIA, BEAD Program guidance (available at <https://broadbandusa.ntia.gov/funding-programs/broadband-equity-access-and-deployment-bead-program>). As of April 2026, 53 states and territories have received NTIA approval of their Final Proposals, and 44 have signed award agreements.

²⁶ HUD, ConnectHomeUSA Program, hud.gov/connecthomeusa (2026).

²⁷ HUD Office of Public and Indian Housing, Notice PIH 2017-04 (2017) (available at <https://www.hud.gov/sites/dfiles/PIH/documents/PIH-2017-04.pdf>).

program with the New York City Housing Authority. These conversations are in early stages, but they reflect the range of public-interest applications that this technology can support.

Broadband access in public housing is not a connectivity issue alone. It enables telehealth access for residents who would otherwise need to travel to see a specialist. It enables remote learning for students who cannot complete homework without internet access. It enables job searches, workforce development, and access to government services for communities that have historically been excluded from the digital economy.²⁸

A detailed briefing document on the public housing broadband initiative is also offered for the Committee's record.²⁹

C. The Common Thread

These initiatives are possible because the community-built Helium Network has reached a scale where it creates meaningful utility. Decentralized physical infrastructure creates an uncommon opportunity for a community to reinvest in itself: the same residents and businesses that deploy hotspots to earn token rewards are expanding wireless coverage that benefits their neighbors, strengthens emergency communications, and supports broadband access in their own communities. But continued growth depends on the deployer incentive that drives the network, and the deployer incentive requires regulatory clarity.

IV. Why the CLARITY Act Must Pass

A. What Happens Without Regulatory Clarity

Nova Labs has experienced firsthand the consequences of regulatory ambiguity for companies building real infrastructure with blockchain technology.

On January 17, 2025, the last business day before the incoming presidential administration took office, the Securities and Exchange Commission filed a complaint against Nova Labs in the United States District Court for the Southern District of New York.³⁰ The complaint alleged that selling functional wireless hardware that distributed tokens for verified network service delivery constituted an unregistered securities offering.³¹ The complaint further asserted that the Helium Mobile phone plan was also an unregistered offering because Helium Mobile subscribers could opt into a Discovery Mapping feature to earn digital assets in exchange for sharing data used to

²⁸ See Pew Research Center, "Internet/Broadband Fact Sheet" (2024) (available at <https://www.pewresearch.org/internet/fact-sheet/internet-broadband/>); FCC, Broadband Deployment Report (2024) (available at <https://www.fcc.gov/reports-research/reports/broadband-progress-reports>).

²⁹ Helium Foundation Public Housing Authority Broadband Proposal (2026), appended hereto as Appendix B.

³⁰ SEC v. Nova Labs, Inc., No. 1:25-cv-00539 (S.D.N.Y.), Complaint filed January 17, 2025 (available at <https://www.sec.gov/enforcement-litigation/litigation-releases/lr-26229>).

³¹ Id. at ¶¶ 1-3.

map network coverage.³² Finally, the complaint alleged that Nova Labs had negligently made misrepresentations in connection with a preferred stock private placement.³³

On April 24, 2025, the SEC dismissed, with prejudice, each and every one of its claims related to digital assets.³⁴ Separately, the negligence claim related to alleged misrepresentations in connection with a preferred stock private placement was resolved through a consent judgment and a \$200,000 civil penalty, without any admission or denial of the allegations.³⁵

The digital asset claims are the ones that matter for this Committee's work. The SEC alleged that selling functional wireless hardware that distributed tokens for verified network service delivery constituted securities transactions. The complaint also alleged that the Helium Mobile phone plan itself constituted a securities offering because subscribers could earn token rewards for mapping network coverage. Those claims were dismissed with prejudice. But the fact that they were brought at all illustrates the problem that the CLARITY Act can solve.

In the absence of clear rules, Nova Labs, a company that holds telecommunications licenses to operate in all fifty states and an FCC Section 214 authorization, serves millions of daily users through carrier partnerships with T-Mobile, AT&T and other national carriers, and is actively developing infrastructure with demonstrated public safety applications, spent years and significant resources under investigation and then in litigation defending against claims that were ultimately abandoned. Those were years and resources not spent deploying hotspots, developing emergency communications capabilities, or bringing broadband to underserved communities.

Companies in the digital asset space have faced the same regulatory ambiguity: innovators who do not know which agency has jurisdiction over their activities, what rules apply, or how to comply even if they want to. The result is not investor protection. The result is that compliant companies are deterred from building in the United States, while bad actors, who never intended to comply in the first place, are unaffected.

B. How the CLARITY Act Addresses This

Had the CLARITY Act been law, Nova Labs would not have gone through this enforcement action. The Act draws a clear line between digital assets that function as investment contracts, which properly belong under SEC oversight, and digital commodities used to operate functional networks, which do not.

Nova Labs' principal interest in the CLARITY Act is the preservation of the exception for programmatic and automatic distributions under the "gratuitous distributions" exemption. This provision is directly relevant to how the Helium Network functions.

³² Id.

³³ Id.

³⁴ SEC, Litigation Release No. 26291 (April 24, 2025) (available at <https://www.sec.gov/enforcement-litigation/litigation-releases/lr-26291>).

³⁵ Id.

Under proposed Section 4B of the Securities Act, as added by Section 102 of the CLARITY Act,³⁶ a "gratuitous distribution" is defined as a distribution of a network token "in exchange for not more than a nominal value of cash, property, services, or other assets in a broad, equitable, and non-discretionary manner."³⁷ The statute provides that "[a] gratuitous distribution, by itself, shall be presumed to not constitute an offer, sale, or distribution of a security."³⁸ The defined mechanisms include distributions that are a "programmatic result of validating or staking activity for a distributed ledger system's consensus mechanism."³⁹

When a deployer's hotspot transfers data for a carrier subscriber, the Helium protocol automatically issues HNT rewards based on measured data volume and quality of service. These distributions are:

- **Programmatic:** They are governed by the protocol's published rules, not by any discretionary decision of Nova Labs or any other entity. The rules are transparent, verifiable on-chain, and apply uniformly to every hotspot in the network.
- **Automatic:** They are executed by smart contracts in response to verified network activity. No human being decides which deployer receives rewards or in what amount. The protocol measures service delivery and compensates accordingly.
- **Compensation for verified service delivery:** The tokens are earned by providing measurable wireless coverage. They are functionally equivalent to payment for services rendered, not to proceeds of a capital-raising transaction.

Nova Labs does not hold a controlling share of the HNT token supply. The Helium Network has been functional and serving users since 2021. The tokens exist to compensate network participants, not to raise capital.

Subjecting these distributions to securities registration requirements designed for investment offerings would be incompatible with how the technology works. You cannot file a registration statement for each of the millions of automatic micro-distributions that occur across 140,000 hotspots every day. The gratuitous distributions exemption recognizes this reality by exempting programmatic, automatic token distributions that are not part of a capital raise and do not involve an investment of money by the recipient.⁴⁰

C. Regulatory Clarity Enables Infrastructure

The CLARITY Act does not ask for deregulation. It asks for the right regulation, applied by the right regulator, under clear rules that market participants can understand and follow. It distinguishes between digital assets that function as securities and digital commodities that power operational networks, and it assigns oversight accordingly between the SEC and the CFTC.

³⁶ H.R. 3633, 119th Cong., available at <https://www.congress.gov/bill/119th-congress/house-bill/3633>.

³⁷ Id. at § 4B(a)(5).

³⁸ Id. at § 4B(b)(4)(A).

³⁹ Id. at § 4B(a)(5)(B)(i).

⁴⁰ See H.R. 3633, 119th Cong., CLARITY Act § 4B(a)(5), (b)(4) (2025).

For the Helium Network, regulatory clarity has a direct and measurable consequence: it determines whether the deployer incentive that built a network of 140,000 hotspots can continue to function, and whether the public benefits that flow from the network, including emergency communications capabilities, broadband in underserved communities, and congestion resilience during disasters and other surges in usage, can continue to grow.

This Committee has done the work. The CLARITY Act passed the House a year ago. I respectfully urge the Committee to continue its leadership in advancing this legislation to enactment.

V. Conclusion

The Helium Network is blockchain technology applied to real-world infrastructure. It provides wireless coverage to millions of Americans through carrier partnerships with T-Mobile, AT&T, and others. It has demonstrated congestion resilience during natural disasters and large-scale public events. It is developing emergency communications capabilities that can address documented failures in indoor 911 call routing and location accuracy. And it is working to bring affordable broadband to public housing communities in New York and California.

All of this was built by a deployer incentive model that uses cryptocurrency to compensate individuals and businesses for providing verified wireless coverage. That model works. But it requires a regulatory environment in which the company supporting the network, the individuals and businesses deploying the hotspots, and the providers using the network, can know what rules apply to their activities and how to comply with them.

The CLARITY Act provides that environment. I respectfully urge this Committee to support its passage with the gratuitous distributions exemption intact.

Thank you for the opportunity to testify. I look forward to answering the Committee's questions.