# **Mobile Network Management Disclosure**

Trilight Mobile is a mobile virtual network operator. As such, it provides wireless communications services over a third-party partner's wireless network. Our third-party partner manages the network, and the disclosures below reflect such network management practices and controls. For the purposes of this disclosure, Trilight Mobile and its third-party partner are collectively referred to as "Trilight Mobile." For network management practices and performance characteristics when connected to Trilight Mobile internet, please see our Network Management Disclosure.

# **Network Management Practices**

Trilight Mobile does not discriminate against lawful Internet content, applications, services, or devices. The bullets below provide an overview of our mobile network practices.

- Blocking. Trilight Mobile does not block access to any specific lawful content, applications, services, or non-harmful devices, subject to reasonable network management as described herein.
- **Throttling**. Trilight Mobile does not degrade or impair access to lawful internet traffic on the basis of content, application, service, user or use of a non-harmful device, subject to reasonable network management as described herein.
- **Affiliate Prioritization**. Trilight Mobile does not directly or indirectly favor some traffic over other traffic to benefit an affiliate.
- **Paid Prioritization**. Trilight Mobile does not directly or indirectly favor some traffic over other traffic in exchange for consideration, monetary or otherwise.
- Congestion and Network Management Practices.
  - Congestion Management. An individual user's experience will vary depending upon many factors, including the selected plan, the network (5G Ultra-Wideband, 5G or 4G LTE) the customer is using, and the device in use.

Trilight Mobile has implemented optimization technologies across its 5G and 4G LTE networks to transmit data files more efficiently to allow available network capacity to benefit the greatest number of users. These techniques include video caching and sizing video files more appropriately for mobile devices. The optimization process is agnostic as to the content itself and to the website that provides it. While Trilight Mobile invests much effort to avoid changing text, image, and video files in the optimization process and while any change to the file is likely to be indiscernible, the optimization process may minimally impact the appearance of the file as displayed on a customer's device.

In addition, in order to optimize customers' video viewing experiences on their devices over our 5G and 4G LTE networks while ensuring a high quality experience for other users of the network, Trilight Mobile seeks to transmit video downloads or streams to smartphones at 480p or 720p, depending on the plan, unless a different

video resolution is disclosed in the description of a particular plan. This practice does not make any distinction based on the content of the video or the source website. To achieve this optimization, Trilight Mobile limits the throughput speeds of such video downloads or streams over our 5G and 4G LTE networks (which may be below the 9-56 Mbps 5G and 4G LTE download speeds typically provided). This practice results in the video provider's content server sending the appropriate resolution video file for that speed, if available.

On certain plans, we may prioritize your 5G and 4G LTE data behind other traffic. If the cell site you are connected to begins experiencing high demand during the duration of your session, your 5G and 4G LTE data speeds may be slower than the other traffic's. Once the demand on the site lessens, or if you connect to a different site not experiencing high demand, your speed will return to normal. Any such network management practices will be disclosed in the descriptions of impacted plans.

### Data Allowances.

- Unlimited. After a line uses 30 GB of high-speed data, it will experience speeds reduced to 128-256 Kbps for the rest of the billing cycle. After a line uses 5 GB of Mobile Hotspot data, it will experience speeds reduced to 600 Kbps.
- Unlimited Max. After a line uses 50 GB of high-speed data, it will experience speeds reduced to 128-256 Kbps for the rest of the billing cycle. After a line uses 10 GB of Mobile Hotspot data, it will experience speeds reduced to 600 Kbps.
- By the Gig. You will receive 1GB of data per line. After you use your allotted data, you will be charged \$15/GB. If a line uses more than 5GB, that line will experience speeds reduced to 128-256 Kbps for the rest of the billing cycle. Customers also have the option to upgrade to Unlimited.
- **Application-Specific Behavior.** Trilight Mobile does not limit, block or rate-control specific protocols or protocol ports other than for security reasons, modify protocol fields in ways not prescribed by the protocol standard, or otherwise inhibit or favor certain applications or classes of applications of traffic on our internet access service.

On certain plans, we may prioritize your data behind other traffic. If the cell site you are connected to begins experiencing high demand during the duration of your session, your data speeds may be slower than the other traffic's. Once the demand on the site lessens, or if you connect to a different site not experiencing high demand, your speed will return to normal. Any such network management practices will be disclosed in the descriptions of impacted plans.

• **Device Attachment Rules.** You may activate devices that Trilight Mobile has certified to be compatible with its network, including devices not purchased directly from Trilight Mobile. Please contact [phone number] to see if your device is compatible.

#### **Performance Characteristics**

- **Service Description.** Based on our carrier partner's internal testing and testing commissioned from third-party vendors, Trilight Mobile expects customers will experience the following speeds:
  - o 5G Ultra Wideband (R): 90-170 Mbps download, 15-30 Mbps upload
  - o 5G (R): 9-56 Mbps download, 2-13 Mbps upload
  - o 4G LTE (R): 9-56 Mbps download, 2-13 Mbps upload
  - o 5G (B): 35-158 Mbps download, 3-21 Mbps upload
  - o 4G (B): 11-64 Mbps download, 1-10 Mbps upload

With respect to latency for use of real-time data applications, Trilight Mobile expects network to device (round-trip) latency to be less than 30 ms on its 5G Ultra Wideband network and less than 100 ms on its 5G and 4G LTE networks. Since our service utilizes our carrier partner's mobile network, and is thus subject to its limitations, these expected latency levels may not reflect the actual latency that you experience. For performance information when connected to Trilight Mobile Internet, please see our **Network Management Disclosure**.

• Impact of Non-Broadband Internet Access Service Data Services. Trilight Mobile Mobile service uses a third party partner's wireless network and shares that network with services that our third party partner offers. When accessing Trilight Mobile Mobile service via Trilight Mobile Internet, service will also be delivered via the access point.

# **Commercial Terms**

- **Pricing and Fees.** The current pricing, promotional rates and terms, and other terms and conditions of Trilight Mobile's packages of mobile service can be found on our website at **[website]** and or by contacting Trilight Mobile's customer service center at [phone number] Information regarding any additional fees that may be applicable can be found at **[website]**. Regular prices as of the date of this disclosure can be found [website]. (Prices and service levels are subject to change.)
- Privacy Policies. Your privacy is very important to us. Personal information you provide is governed by Trilight Mobile's Privacy Policy, which is posted on Trilight Mobile s Website at [website] and is subject to change from time to time. Personal information provided by you to Trilight Mobile is used primarily to provide a customized experience as you use our services, and is only shared with third parties in accordance with Trilight Mobile's Privacy Policy and consistent with applicable law. Trilight Mobile reserves the right, as required or permitted by law, to provide account and user information, including email, to third parties and to cooperate with law enforcement authorities in the investigation of any criminal or

- civil matter. Such cooperation may include, but is not limited to, monitoring of Trilight Mobile's network consistent with applicable law.
- For Questions, Complaints and Redress Options: For immediate assistance with issues or complaints involving your mobile service, please contact Trilight Mobile's customer service centers at [phone number] or use the Help function at [website]. We have agents available 24 hours a day, seven days a week to assist you. You can also contact us by email at [email] for customer service issues or technical and network issues. Our mailing address is: Trilight Mobile; [address]. For information concerning the FCC's formal and informal complaint procedures, please refer to the FCC's website at <a href="https://www.fcc.gov/guides/getting-broadband">www.fcc.gov/guides/getting-broadband</a>.