NETWORK MANAGEMENT POLICY

Strada Communications (Company) commits to using reasonable network management practices, and to manage its network and provide access in accordance with the Federal Communications Commission's (FCC's) rules. The FCC prohibits providers of Broadband Internet Access Service (BIAS) from engaging in blocking, throttling, and paid prioritization of lawful content, applications, services, or non-harmful devices, subject to reasonable network management. Reasonable network management includes avoiding congestion, combating harmful illegal content, and responding to legitimate safety and security issues. Company's policies regarding network management practices are outlined herein in an effort to inform you of Company's network performance, management practices, and terms of service.

Network Practices

Congestion Management. Congestion due to malfunctioning hardware and/or software will be remedied as quickly as network engineers can diagnose and identify the offending hardware / software. Congestion due to malice will be remedied using any technique available, including protocol-aware filtering and rate-limiting, to control and limit the offending source. Company may seek criminal charges against those who inflict network malice. Company may also attempt to recover costs incurred from network malice.

Company reserves the right to prioritize traffic based on real time and non-real time applications during heavy congestion periods based on generally accepted technical measures. Company reserves the right to set speed thresholds on the amount of data you as a customer can upload and download within stated time periods. If you exceed these thresholds, Company may temporarily limit the speed at which you can send and receive data over the Company access network. Company may use other traffic management ~~and prioritization tools~~ to help ensure equitable access to the Company network for all customers. Excessive bandwidth or hardware usage that adversely affects Company's ability to provide its Internet or any other service may result in additional account management and fees.

Company reserves the right to monitor customer usage and evaluate on an individual account basis bandwidth or hardware utilization to efficiently manage the performance of the network to ensure a sustainable quality broadband service is provided. Peak network usage is between 4 pm and 11 pm Monday – Sunday. During peak usage times, priority may be given to applications such as browsing, email, streaming, instant messaging, gaming and VoIP.

User-Based Practices. Company does not target specific users or user groups for congestion management.

Blocking or Throttling. Company reserves the right to disconnect or limit any account access to the Internet that in the opinion of its system administrator is a threat to the security or lawful operation of the Internet service or the service's software and/or hardware or that repeatedly violates the terms of its Acceptable Use Policy (AUP) or other terms of service. Company reserves the right, but does not assume the responsibility, to block or limit access to content that violates its AUP. Company will not unjustly or unreasonably block access to lawful content, applications, services or non-harmful devices, subject to reasonable network management. Company also will not unjustly or unreasonably (other than reasonable network management elsewhere disclosed) degrade or impair access to lawful Internet traffic based on content, application, service, user, or use of non-harmful devices, including a description of what is throttled and when.

Affiliated or Paid Prioritization. Company does not unjustly or unreasonably favor some traffic over other traffic including through use of techniques such as traffic shaping, prioritization, or resource reservation, to benefit an affiliate or in exchange for consideration, monetary or other benefit.

Zero Rating. Company does not engage in zero rating.

Application-Specific Behavior. Company does not make use of any application-specific network management practices. Company does not modify protocol fields in ways not prescribed by the protocol standard. Company does not inhibit or favor certain applications or classes of applications. Company does not block or rate-control specific protocols or protocol ports, except for malformed or non-standard protocol traffic as identified by Company. Company reserves the right to block outbound Simple Mail Transfer Protocol (SMTP) from residential IP addresses to protect against unsolicited commercial email (UCE) or spam.

Device Attachment Rules. Devices connecting to Company's network must conform to general public standards and be non-harmful to the network.

Security. Company provides its own methods to secure and protect its Internet service and network. Such action is not a substitute for the customer providing his/her own security or protection for your own software, devices, network or data. Company specifically disclaims any liability for any breach of security or any harm to customer's computing system while connected to Company's Internet service.

Performance Characteristics

Service Description. The advertised speed of Company's Internet service is the maximum bandwidth throughput that is available and achievable with the technology utilized by Company. Advertised speeds/latencies can be found in our Broadband Labels located at https://www.StradaComm.com. Our customer serving networks are comprised of various access platform technologies that deliver Internet service. Some characteristics of generally available Internet access by Speed Package.

- **FTTP** (Fiber-to-the-premise) supports up to 1000 Mbps, less than 50ms latency, depending on service level subscribed.

Several factors may affect the actual bandwidth throughput of Company's Internet service offerings. This includes but is not limited to distance between service point and Company's central office as well as the customer's computer, modem or router used. Internet traffic and activity during peak usage periods may also impact the available bit rate.

Commercial Terms

Pricing .Pricing for our services and fees can be found online at: https://www.StradaComm.com.

Privacy Policies. Our Privacy Policy can be found online at: https://www.stradacomm.com/privacy-policy/ . Company does not generally inspect network traffic. Company does not otherwise store, use, or provide traffic information for non-network management purposes or those not identified in the Privacy Policy. Certain traffic information is retained and stored for specific periods of time as required by state or federal law. This

includes information stored and provided to law enforcement as it relates to information requested by law enforcement pursuant to national security and/or criminal statutes and Acts.

Redress Options

If you have any questions or concerns regarding this Network Management Policy, please contact 866-629-8200.