

BROADBAND TRANSPARENCY DISCLOSURE

This disclosure provides Global Connection Inc. of America d/b/a StandUp Wireless (“StandUp Wireless,” “we,” “us,” or “our”) customers (or “You” and “your”) with information about the network management practices, performance characteristics, and commercial terms applicable to our mass market wireless broadband Internet access services (“Broadband Services”), consistent with the Federal Communications Commission’s (“FCC’s”) Transparency Rule. Broadband Services provide customers with the ability to transmit and receive data from all or substantially all Internet endpoints. As a Mobile Virtual Network Operator (“MVNO”), we provide our Broadband Services entirely by using the facilities of our underlying carrier, a leading nationwide wireless provider (“Underlying Carrier”). While we have some control over aspects of the Broadband Services you receive from us, we do not actively manage the networks—our Underlying Carrier does. As such, this disclosure describes the experience you may have using our Underlying Carrier’s network.

The information provided in this disclosure is meant to assist customers in making informed choices about the purchase and use of our Broadband Services, and will assist providers of Internet applications, content, and services in developing, marketing, and maintaining their Internet offerings. The information provided relates to your experience while using the network of our Underlying Carrier and may not describe the practices, performance, or terms you may experience while using extended coverage networks or roaming on affiliated networks. We encourage users of our Broadband Services to familiarize themselves with this information and to provide us with feedback about our Broadband Services so that we can continue to provide an excellent experience. Nothing in this disclosure changes your rights and obligations, or ours, under our Terms and Conditions, available at standupwireless.com/terms-conditions, or our Privacy Policy, available at standupwireless.com/privacy-policy. This disclosure is provided for informational purposes only and we may change the information at any time, without notice.

Network Management Practices

How does StandUp Wireless manage congestion with respect to its Broadband Services?

StandUp Wireless strives to provide a high-quality Internet experience for all our customers. Our Underlying Carrier, which owns and operates the network StandUp Wireless uses to provide its Broadband Services, manages its network for the benefit of all users of its network based on a variety of factors and its technical expertise. Like the other networks that make up the Internet, the network of our Underlying Carrier is shared, which means that the transmission links and other network resources used to provide Broadband Services are shared among StandUp Wireless customers and other users of our Underlying Carrier’s network. As a result, temporary congestion causing reduced speeds or lost connections may occur when a large number of users in a concentrated area access a particular network at the same time or when some customers consume a very large amount of network capacity during peak usage times, as well as during planned network maintenance. Our Underlying Carrier may use

congestion management techniques to ensure the best possible experience for the most possible customers, including the techniques described below.

Congestion-Based Data Management. During periods of congestion, our Underlying Carrier may use Congestion-Based Data Management to manage the network. With Congestion-Based Data Management, our Underlying Carrier may prioritize data traffic for some customers over other customers. The customers with lower priority may experience reduced data speeds and increased latency as compared to the other customers using the same cell site, which may cause websites to load more slowly or affect the performance of data-heavy activities such as video streaming, video conferencing, or interactive gaming. Customers subject to Congestion-Based Data Management will only experience reduced speeds and increased latency when they access data services using a cell site experiencing network congestion at the same moment. As soon as the congestion at the cell site abates, or if the customer's session migrates to an uncongested cell site, speed and latency will return to normal. In addition, this network management practice adjusts dynamically to address the amount of congestion, which can start and stop over a very short time period (often measured in fractions of a second), further minimizing any customer impact. However, because the amount of congestion at a cell site can vary significantly, the performance impact may also vary significantly.

Video Optimization. With the ever increasing growth in smart phone and tablet usage on wireless networks, and the growing prevalence of video streaming, our Underlying Carrier may use reasonable network management video optimization techniques. One such technique is "Buffer Tuning," where a sufficient amount of video is delivered to a device so that the user can start viewing the video, and the remainder of the video is delivered "just in time" for uninterrupted viewing. This optimizes the user's data consumption and frees up network resources for all users. Without Buffer Tuning, video content may be completely delivered to a device and charged against the user's data allotment regardless of whether it is viewed. Buffer Tuning only applies to internet browser traffic (HTTP, port 80) for recorded video streaming and does not affect real-time video streaming. Buffer Tuning does not alter video content and should not directly introduce any adverse impact to the viewing experience. Our Underlying Carrier may also adjust the delivery rate for streaming video, which causes videos to be delivered in lower resolutions and using less data. This may impact the appearance of streaming video as displayed on a user's device or the speed at which a video downloads.

Does StandUp Wireless limit data usage or provide customers with tools to monitor and control their data usage?

StandUp Wireless offers prepaid and Lifeline service plans with a pre-established allotments of data and the opportunity to purchase additional data. Customers select how much data they receive under their service plan. Customers may view their remaining data balance using our online portal or by contacting customer service.

Does StandUp Wireless favor certain websites or Internet applications by blocking or throttling traffic, modifying particular protocols, or prioritizing certain traffic on its Broadband Services?

Except for the reasonable network management practices described above, StandUp Wireless does not favor certain websites or Internet applications by blocking or throttling lawful Internet traffic on the basis of content, application, service, user, or use of non-harmful devices on its Broadband Services. Nor does StandUp Wireless modify particular protocols, protocol ports, or protocol fields in ways not prescribed by the protocol standards, subject to reasonable network management. Additionally, StandUp Wireless does not directly or indirectly favor some traffic over other traffic (such as through prioritization, resource reservation, or traffic shaping) for any type of consideration. In response to a specific security threat against the networks of our Underlying Carriers or our customers, we or our Underlying Carrier may need to block or limit the flow of traffic from certain locations or take other appropriate actions. Additionally, our Underlying Carrier may favor some traffic over other traffic to address the needs of emergency communications, law enforcement, public safety, or national security authorities, consistent with or as permitted by applicable law.

What practices has StandUp Wireless adopted to manage network security?

As an MVNO, StandUp Wireless does not have the ability to manage the security of its Underlying Carrier's network. However, our Underlying Carrier has implemented reasonable physical, technical, and administrative safeguards to help guard against a wide range of security threats, including viruses, botnets, worms, distributed denial of service attacks, SPAM, unauthorized access, and other harmful activity. Our Underlying Carrier also uses a variety of network monitoring tools to maintain stability and functionality of the network and for other operational purposes. As our service provider, our Underlying Carrier stores the information it gathers through this monitoring for only as long as we have a business purpose for our Underlying Carrier to maintain it. Our Privacy Policy further describes how we collect, use, and share this information. You can view our Privacy Policy at standupwireless.com/privacy-policy.

If our Underlying Carrier detects a security threat, it will attempt to isolate the threat and minimize the impact to network services. It may use a variety of security measures to protect the network, including blocking malicious or unlawful traffic, redirecting the flow of traffic over some portions of the network, or taking other actions to address the threat. For example, it may block certain ports that transfer malicious or disruptive traffic. It may also attempt to limit actions to the specific portions of the network or customer base impacted by the security threat and only for as long as necessary to mitigate the threat. Our Underlying Carrier may scan or analyze network addresses that are registered through the Underlying Carrier, including addresses that may have been delegated to customers, and/or routes that originate from the Underlying Carrier's networks to detect vulnerabilities that might be used to compromise the assets of StandUp Wireless, our Underlying Carrier, its customers, or our customers or that might be used in attacks against others. In doing so, it will seek to avoid disrupting Broadband Services to customers. We and our Underlying Carrier may use information derived from these

activities to identify and address security issues or to notify customers of issues. Despite these security practices, StandUp Wireless cannot guarantee that you will not encounter unwanted, harmful, or malicious internet traffic while using our Broadband Services and encourages customers to adopt their own reasonable security practices.

Does StandUp Wireless restrict the types of devices that customers can use with its Broadband Services?

StandUp Wireless customers may attach devices of their choice to our Broadband Services, so long as the devices are compatible and do not interfere with the networks of our Underlying Carrier, and comply with all applicable laws, rules, regulations, and standards.

Network Performance Characteristics

What factors affect the performance of StandUp Wireless' Broadband Services?

Although our Underlying Carrier engineers its network to accommodate all users and user types, including based on average and anticipated peak usage of the network, end-to-end performance of our Broadband Services can depend on a variety of factors, many of which cannot be anticipated or are outside of our and our Underlying Carrier's control, including: your location relative to our coverage area, your proximity to a cell site, the capacity of the cell site, the number of other customers connected to the same cell site, the number of customers simultaneously using the network, the services other users are using, topography, weather, obstructions, use inside a building or a moving vehicle, radio frequency interference, the capabilities of your device, the applications you are using, the server with which your device is communicating, the destination of your Internet traffic, overall traffic on the Internet, whether there are network outages, and applicable network management practices as discussed above. These factors can impact the availability of network resources for Broadband Services at any particular time. In addition, our Underlying Carrier has designed its wireless services to provide customers with a high-quality voice experience during simultaneous voice and data sessions, which may affect data performance, including, but not limited to, a temporary reduction in speed to minimize the likelihood of dropped calls.

What performance can I expect from StandUp Wireless' Broadband Services?

The performance of Broadband Services is generally evaluated based on speed and latency.

Speed

Speed reflects the capacity at which Broadband Services can transmit data. This capacity is typically measured in the number of kilobits, megabits, or gigabits that can be transmitted in one second (kbps, Mbps, or Gbps). Some applications, like a short email without attachments or basic web browsing, do not require high-speed service to function optimally. Other activities, like transferring large data files, can be performed faster with higher-speed services. The

speeds you receive from our Broadband Services may not be optimal for certain applications, particularly those involving real-time or near real-time, high-bandwidth uses, such as streaming video or video conferencing.

StandUp Wireless provides high-speed mobile broadband Internet access service on at least 3G mobile networks at 3G or better speeds (at least 200 kbps symmetrical), where the network will support such performance. In addition, our customers may receive 4G or 4G LTE service where available for all or part of their allotted broadband data. When such service is available, we at our sole discretion may provide access to higher than 3G speeds, and in such cases, our customers will typically experience download speeds between 9–47 Mbps and upload speeds between 4-20 Mbps. These speeds do not necessarily reflect speeds achievable along the entire end-to-end transmission path to all Internet destinations.

Latency

Latency, also known as delay, is the amount of time from when a data packet is sent to when it is received. For Broadband Services, latency is usually expressed as the round-trip time in milliseconds (ms) that it takes for a data packet to travel between two end points on the Internet (from point A to point B and then back to point A). Some applications, such as email, can tolerate a substantial amount of latency without any noticeable impact on the application's performance. Other applications, such as real-time video conferencing, require lower latency to function properly. End-to-end latency reflects the cumulative effect of the individual latencies that occur along the end-to-end network path.

StandUp Wireless provides high-speed mobile broadband Internet access service on at least 3G mobile networks at round-trip latency (107 to 223 milliseconds) associated with 3G mobile networks where the network will support such performance. In addition, our customers may receive 4G or 4G LTE service where available for all or part of their allotted broadband data. When such service is available, we at our sole discretion may provide access to better than 3G network performance, and in such cases, our customers will typically experience round-trip latencies between 30-50.

Commercial Terms

Where can I find the rates and other fees that apply to StandUp Wireless' Broadband Services?

Descriptions of the rates and fees applicable to our Broadband Services are available on our website, standupwireless.com. StandUp Wireless does not charge termination fees.

Where can I find the Terms and Conditions and prohibited uses that apply to StandUp Wireless' Broadband Services?

The Terms and Conditions, which describes prohibited uses in our Acceptable Use Policy, can be found at standupwireless.com/terms-conditions.

What are StandUp Wireless' privacy practices for its Broadband Services?

To learn about our privacy practices for our Broadband Services, please review our Privacy Policy at standupwireless.com/privacy-policy.

How can I get assistance if I have a question or concern or need more information about StandUp Wireless' Broadband Services?

If you have questions or concerns about our Broadband Services, please contact us using the following information:

Email: support@standupwireless.com

Phone: 1-800-544-4441 during normal business hours, Monday through Saturday, 8AM to 10PM Eastern Time and Sunday, 9AM – 6PM Eastern Time.

Mail: StandUp Wireless, PO Box 2418, Norcross, GA 30091.