

## **Venture Communications Cooperative Network Management and Privacy Policy for Mobile**

Venture Communications Cooperative provides commercial mobile wireless services, including mobile voice and data services, including Internet access services, as a “Mobile Virtual Network Operator” or MVNO. As such, more specifically, Venture Communications (hereinafter referenced as “Venture” or the “Company”) provides its mobile wireless communications services with the assistance of “Telispire” a third-party “mobile virtual network aggregator/operator”. Telispire through its arrangements with trusted national wireless carriers gives companies like Venture the ability to resell and directly provide to its rural area customers strong and reliable mobile wireless services.

### **A. Network Management Practices**

To the extent that any network management practices performed directly by Venture relating to its commercial mobile wireless services may impact the internet access services provided by the third-party managed wireless network to end user customers, the terms found in the Venture Communications Cooperative Network Transparency Statement found at <https://venturecomm.net/wp-content/uploads/2023/03/Venturecomm-Network-Transparency-FINAL.pdf> would apply. Please note that in instances where any of the Venture Communications Cooperative network management provisions may conflict with the network management provisions of any third-party carriers provisioning the underlying wireless network services relied upon by Venture, the third-party network management policies and/or practices would be given precedence and more likely affect the end user’s service.

With respect to Venture’s network management specifically, the Company affords full access to all lawful content, services, and applications available on the internet and does not routinely monitor, inspect, or store the network activity and traffic of its internet access service users. The Company does, however, reserve the right to monitor bandwidth, usage, data transmissions and content for purposes of protecting the integrity of its communications network and its internet access service through reasonable network management practices.

In the interest of providing the best online experience possible for all of its internet access customers the Company utilizes reasonable network management practices tailored to achieve legitimate network management purposes. By engaging in reasonable and responsible network management, the Company prevents its customers from being subjected to the negative effects of spam, viruses, security attacks, network congestion, and other risks that threaten to degrade the internet service experience. The Company’s network management practices, as set forth below, are consistent with industry standards.

## **B. Performance Characteristics**

Based on underlying carrier internal testing, Venture expects customers will experience the following speeds:

- o 5G Ultra Wideband: 90-170 Mbps download, 15-30 Mbps upload*
- o 5G: 9-56 Mbps download, 2-13 Mbps upload*
- o 4G LTE: 9-56 Mbps download, 2-13 Mbps upload*

With respect to latency for use of real-time data applications, Venture 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 Ventures service utilizes the mobile networks of underlying carriers arranged through a third-party aggregator/operator these referenced latency levels may not reflect the actual latency that you experience. For performance information when connected directly to the Venture Communications Cooperative wireline internet access service, through your mobile device, please see Network Transparency Disclosure at <https://venturecomm.net/wp-content/uploads/2023/03/Venturecomm-Network-Transparency-FINAL.pdf>.

## **C. Commercial Terms**

To see the Company's current promotions and pricing on its mobile wireless broadband internet access service, please visit our website at <https://venturecomm.net/cellular/>, which includes Broadband Labels for each of our broadband internet access offerings or call 1-855-928-1342 to speak with a customer service representative. The Company's internet service is priced on a flat-fee basis (plus taxes). The information on Venture's current Broadband Labels is also available in a "machine readable" spreadsheet form at <https://venturecomm.net/cellular/>.

## **D. Privacy Policy**

Venture may collect equipment information to identify the equipment customer is using on the network, including but not limited to: equipment type; serial number; settings; configuration; and software. The Company may also collect performance information to examine the operation of the equipment, services, and applications the customer may use on the network, including but not limited to: IP addresses; URLs; data transmission rates; latencies; location information; security characteristics;, and information about the amount of bandwidth and other network resources customer is using in connection with uploading, downloading or streaming data to and from the internet. This collection of or monitoring of network traffic, activity, performance information, and/or equipment information by the Company is done solely for reasonable network management purposes. Similarly, the Company does not distribute

information on end user network activity and/or traffic information to any third-party entities for any non-network management purpose.

Venture is required to comply with relevant federal and state laws, regulations, judicial orders, and governmental requests for information, relating to information covered under this Privacy Policy, as well as other categories of information. Accordingly, any such information may be disclosed to other entities if the Company determines, in its sole discretion, that the disclosure is required by law or is necessary to protect its interests or the interests of its customers. The Company may also find it necessary to disclose any such information as part of any merger, acquisition, sale of company assets or transition of service to another service provider.

### **Disclaimers**

This Privacy Policy is not intended to affect, alter or otherwise supersede the legal status of joint efforts by broadband internet access service providers like Venture and other service providers that are designed to curtail copyright infringement in response to information shared by copyright holders and/or their agents that is timely, effective, and is designed to accommodate the legitimate interests of service providers, copyright holders, and internet access end users. Furthermore, neither the FCC's Internet Freedom Transparency rules nor this Privacy Policy are intended to prohibit or prevent the Company from engaging in reasonable efforts to address the transfer of unlawful content or unlawful transfers of content over its communications network. For additional information, please review activities that violate our Internet Service Terms of Agreement or Acceptable Use Policies.

### **Contact Us**

End users with questions, concerns or complaints regarding this Network Management and Privacy Policy are encouraged to contact Venture for more information or explanation.

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