# NETWORK MANAGEMENT POLICY

DTC Communications (“We”, “Our”, “Us”) provides this Network Management Policy (“Policy”) in accordance with Federal Communications Commission (“FCC”) requirements to disclose certain network management practices, performance characteristics, and commercial terms. Additional information about our broadband policies and practices is available at https://www.dtccom.net/legal/.

## Network Practices

We engage in network management practices that are tailored and appropriate for achieving optimization on our network considering the particular network architecture and technology of our broadband Internet access service. Our goal is to ensure that all our customers experience a safe and secure broadband Internet environment that is fast, reliable, and affordable. We want our customers to experience all the Internet offers, whether it is social networking, streaming videos, listening to music, or communicating through email and videoconferencing.
We manage our network using various tools and industry-standard techniques to ensure fast, secure, and reliable Internet service.

1. **Blocking:** We do not block or discriminate against lawful Internet content, applications, services, or non-harmful devices.  We conduct only reasonable network management.
2. **Throttling:** We do not throttle, impair, or degrade lawful Internet traffic based on content, application, service, user, or use of a non-harmful device. We engage in only reasonable network management practices.
3. **Affiliated Prioritization:** We do not favor any Internet traffic over others, including through the use of techniques such as traffic shaping, prioritization, or resource reservation, to benefit an affiliate, and we have no plans to do so.
4. **Paid Prioritization:** We have never engaged in paid prioritization. We do not favor or prioritize any Internet traffic over others, and we do not prioritize Internet websites over others in exchange for any consideration to benefit any content, applications, services, or devices.

## NETWORK MANAGEMENT PRACTICES

Our network management practices are intended to ensure that we provide our customers with the best possible Internet access. We do not inspect traffic for any other purposes other than to keep track at the network level, where traffic flows ensuring that the network is adequate for the demands of customers. To achieve this goal, we employ network management techniques such as identifying spam and preventing its delivery to customer email accounts, detecting malicious Internet traffic, and preventing the distribution of, or inadvertent access to, malware, phishing, viruses, or other harmful code or content.

## 1. Congestion Management

We monitor the connections on our network in the aggregate for all types of traffic to determine the utilization rate. We may take appropriate measures to relieve undue congestion if it occurs on the network.

Our network and congestion management practices do not discriminate based on the type of application being used, nor are they based on any particular customer's aggregate monthly data usage. We examine only current network conditions, not our customers' online activities.

We also check for abnormal traffic flows, network security breaches, malware, loss, and damage to the network. If a breach is detected or high-volume users are brought to light by complaint, we provide notification to the customer.

Customer conduct that abuses or threatens our network or violates our Acceptable Use Policy, Internet service Terms and Conditions, or Internet Service Agreement will be asked to stop immediately. If a customer fails to respond or cease such conduct, we may suspend service or terminate the user's account.

If we take any congestion management actions, the vast majority of our customers' Internet activities will be unaffected. Some customers may, however, experience more extended download or upload times or slower surf speeds.

## 2. Application-Specific Behavior

Except as may be provided elsewhere herein, we do not engage in any application-specific network management activities on our network. Customers may use any lawful applications with us. We do not inhibit or favor applications or classes of applications over our High-Speed Internet/broadband data network. All traffic is treated in a "protocol-agnostic" manner, which means management is not based on applications and is also content neutral. We do not block or rate-control specific protocols or protocol ports, modify protocol fields, or otherwise inhibit or favor certain applications or classes of applications.

## 3. Device Attachment Rules

Customers must use PPPoE for authentication of point to point connections between devices on the network. There is a limit of one (1) PPPoE session per account. For best results, modems, wireless modems, or other proprietary network gateways used on our broadband network should be provided by us. Customers may, however, attach their own devices to their modems, including wired or wireless routers, laptops, desktop computers, video game systems, televisions, or other network-enabled electronics equipment. Customers are responsible for ensuring that their equipment does not harm our network or impair other customers' service. We are not responsible for the functionality or compatibility of any equipment provided by our customers. Customers are responsible for securing their own equipment to prevent third parties from unauthorized access to our broadband network and will be held responsible for the actions of such third parties who gain unauthorized access through unsecured customer equipment. If we discover a customer device is harmful to our network, we have the right to request that the customer remove such device.

## 4. Security

We know the importance of securing our network and customers from network threats and annoyances. We promote the security of our network and our customers by protecting them from threats like spam, viruses, firewall issues, and phishing schemes.

We also deploy spam filters for our email service to divert spam from an online customer’s email inbox into a quarantine file while allowing the customer to control which emails are identified as spam. Customers may access spam files through the email program.

As normal practice, we do not block protocols, content, or traffic for network management, but we may block or limit traffic such as spam, viruses, malware, or denial-of-service attacks to protect network integrity and the security of our customers.

These tools and practices may change from time to time to keep up with changing network technologies and new and innovative ways our customers use the network.

## PERFORMANCE CHARACTERISTICS

### 1. Service Description

We offer Internet service over Digital Subscriber Line (“DSL”) and Fiber-to-the-Home (“FTTH”). Information about our different service offerings can be found at https://www.dtccom.net/internet/. All our broadband services are best effort and can support real-time applications such as video conferencing, gaming, and instant messaging that require quality of service (QoS) provisioning in terms of bounds on delay and packet loss.

### 2. Network Performance

We make every effort to support advertised speeds and will dispatch repair technicians to customer sites to perform speed tests as needed to troubleshoot and resolve speed and application performance caused by our network.

The FCC requires that we disclose information regarding the expected and actual speed and latency of our Internet access service offerings. Latency measures the average time it takes for a data packet to travel from one point on a network to another. It is typically measured by round-trip time utilizing milliseconds. While latency generally does not significantly impact day-to-day Internet usage, certain applications, such as high-definition multiplayer online games, may be particularly affected by it.

Our advertised speeds are estimates that we target to achieve for our customers. We cannot guarantee that a customer will achieve those speeds at all times. The actual speeds achieved by customers may vary based on a number of factors, including, but not limited to: (a) the performance and capabilities of the customer’s computer; (b) the connection between a customer’s computer and service demarcation, such as the use of wireless routers; (c) variances in network usage; (d) the distance a packet of information must travel from the customer’s computer to its final destination on the Internet; (e) congestion or variable performance at a particular website or destination; or (f) performance characteristics of transmissions over the Internet that are outside of our control. Accordingly, customers should consider the capabilities of their own equipment when choosing broadband service. Customers may need to upgrade their computers and other networks in their homes or offices to take full advantage of the chosen broadband plan.

There are a number of available tools online that customers may utilize to measure Internet performance. Please note that all speed tests have biases and flaws and should be considered a guide rather than a conclusive measurement of performance.

We test each service for actual and expected access speeds at the time of network installation to demonstrate that the service is capable of supporting the advertised speed.

Customers may also test their actual speeds using the speed test located at http://irisharbor.speedtestcustom.com/ and may request assistance
by calling our business office at 615-529-2955 or emailing WeCare@DTCcom.net.

The following table shows our internal testing results.

**Residential and Business Speeds**

| **Advertised Download/Upload Speed (Mbps)** | **Technology** | **Typical Median Download/Upload Speed (Mbps)** | **Typical Median Latency (ms)** |
|---|---|---|---|
| 100 Mbps/100 Mbps | Fiber | 80 Mbps/80 Mbps | 30 ms |
| 300 Mbps/300 Mbps | Fiber | 240 Mbps/240 Mbps | 30 ms |
| 500 Mbps/300 Mbps | Fiber | 400 Mbps/400 Mbps | 30 ms |
| 1000 Mbps/1000 Mbps | Fiber | 800 Mbps/800 Mbps | 30 ms |
| 2000 Mbps/2000 Mbps | Fiber | 1600 Mbps/1600 Mbps | 30 ms |
| 5000 Mbps/5000 Mbps | Fiber | 3000 Mbps/3000 Mbps | 30 ms |

## 3. Impact of Non-BIAS Data Services

The FCC defines Non-Broadband Internet Access Services (“Non-BIAS”) to include services offered by broadband providers that share capacity with Broadband Internet Access Services (“BIAS”) (previously known as “Specialized Services”) also offered by the provider over the last-mile facilities.

Real time services, such as Non-BIAS services, include Voice over Internet Protocol (VoIP) and Internet Protocol (IP) video services, command optimal bandwidth. As Non-BIAS traffic is combined with general Internet traffic on our network, broadband customers could experience service delays, although very unlikely, if there is an occurrence of congestion on our network. In any such event, the Non-BIAS traffic is given priority over general Internet traffic.

We provide Hosted Voice-over-the-Internet-Protocol (VoIP) services. The VoIP traffic uses private RFC 1918 addresses, dedicated paths for VoIP, and QoS on the routers/switches it touches. The QoS priority is based on the source and destination IP. Where VoIP traffic is combined with best effort Internet traffic and QoS priority is employed, the network could endure marginal delays if there are instances of bandwidth contention, although very unlikely.

We also provide IP video service to end-users. Generally, this non-BIAS data service does not adversely affect the last-mile capacity available for our broadband Internet access services, or the performance of such services. However, in the unlikely event that there is significantly heavier use of non-BIAS services (particularly IP video services), this may impact the available capacity for and/or the performance of its broadband Internet access services. We will monitor this situation and appreciate feedback from our customers.

## COMMERCIAL TERMS

### 1. Pricing

We offer multiple levels of internet service, all with no monthly data cap. The current pricing and other terms and conditions of the various tiers can be found at https://www.dtccom.net/internet/ or at https://www.dtccom.net. Prices do not include applicable federal, state, or local taxes and regulatory fees. Prices and packages are subject to change.

### 2. Privacy Policies

We value the privacy of our internet service customers. Like most companies, we collect certain information about our customers and use it to provide our services. We collect information when our customers interact with us, when our customers use our internet service, and when our customers visit our website. This information is used to deliver, provide, and repair our services and establish and maintain customer records and billing accounts. We protect the information we have about our customers and require those we share it with to protect it. We do not sell, license, or share information that individually identifies our customers with others without your consent, except as necessary when working with vendors and partners for business purposes and when necessary for them to do work on our behalf. Additional details about our Privacy Policy can be found at https://www.dtccom.net/legal/.

## 3. Redress Options

We strive to provide excellent customer service and resolve any issues promptly. If you have questions, complaints, or need additional information, please call 615-529-2955 or email WeCare@DTCcom.net.