# Network Management Policy

Hamilton County Telephone Co-op and Hamilton County Communications, Inc., ("We", "Our", "Us") provide this Network Management Policy ("Policy") in accordance with Federal Communications Commission ("FCC") requirements to disclose certain network management practices, performance characteristics, and commercial terms.

**Definitions**

Service – Internet access purchased from us. This includes connectivity from your equipment at your premises to the Internet equipment at our office, the connection of our equipment to the Internet, and our equipment that is used to route and manage your traffic to and from the Internet and to provide you with services such as e-mail, web surfing, file transfer, Internet video, and others.

Bandwidth – The amount of data per second. This may be thought of as the "pipe" that carries Internet traffic.

Bandwidth capacity – The amount of bandwidth that we or another network provider makes available for your use, such as the amount of data that can be sent over a wire or fiber optic system.

Bandwidth demand – The amount of bandwidth that a customer wants to use.

Congestion – A situation where the total bandwidth demand (in bits of information per second) on a component of the Internet, including on any part of our network, exceeds the bandwidth capacity of that component to such an extent that traffic flow and service experiences degradation. Congestion is usually of a transitory nature, however, in some cases, such as an extremely popular website, it may last for a significant period.

Degradation of Service – Less than optimal performance of Internet services. This may appear to you as a slow website and email response or a distorted or frozen video.

Nominal Bandwidth – The bandwidth of the service package you purchase. This is your maximum allowed bandwidth.

## 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 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 may block any service, protocol, source, or destination that we determine to be illegal or a threat to life, property, or national security, or if ordered to block or otherwise modify your data by law enforcement agencies.

We may 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.

At this time, we do not implement network management techniques when congestion occurs, however, in times of congestion on our network, we may, at our sole discretion, implement reasonable network management techniques to protect the services of all of our customers so that each customer has adequate service quality. We will not implement network management if degradation of service is caused by congestion on portions of the Internet outside of our network.

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.

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. 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

There are no restrictions on the types of devices you may connect to our network other than that they must be approved by the FCC for use in the US telecommunications network. You may not connect any equipment to our network that is not approved by the FCC. Most commercially available equipment, such as modems, routers, and PCs, are approved. All equipment approved by the FCC will have a label stating that it is approved and what the type of approval is. This information is also found in the user's manual or printed instructions that are provided with the equipment and may be found online at the manufacturer's website. You should read this label whenever you buy any equipment you wish to connect to our network. If you have questions about any particular equipment, please call us at 618-736-2211, 800-447-8725 or 618-736-2242.

Our Internet access service is designed to function with accepted industry-standard interface software, such as those provided by Microsoft, Apple, and others. If you use software not widely used on the worldwide Internet, you may experience problems with compatibility between your software and our Internet access service. If you have any questions, please call us at 618-736-2211, 800-447-8725, or 618-736-2242, and we will try to help you resolve this problem.

It is the customer's responsibility to ensure that their software and operating interfaces conform to industry-accepted specifications. 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 use the latest industry best practices to maintain the integrity and security of our network. This may include security protections that interfere with some types of customer traffic. If you believe your services are being disrupted by our security systems, please contact us at 618-736-2211, 800-447-8725 or 618-736-2242.

We provide a level of protection for your computers from spam, viruses, and other malicious or unwanted items. While we strive to provide the best protection possible for your computer, we make no guarantees that we can prevent all malicious or unwanted items from accessing your computer. It is the customer's responsibility to protect their computers and other devices from

unwanted or harmful items. It is very strongly recommended that you provide your own virus and malware protection, spam filtering, and firewall software; solutions are available on our website. There are additional considerations regarding Internet security related to our Internet access service. See our Acceptable Use Policy at https://www.hamiltoncom.net/.

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. Spam files are automatically deleted if not accessed within 10 days.

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"), Fiber-to-the-Home ("FTTH"), High Speed Broadband only Service ("HSBoS"), and Wireless Internet. The internet service levels available for your location depend on what type of internet service we are able to provide in your area. If you are unsure of what type of internet service is available in your area, please contact us at https://www.hamiltoncom.net/about-hamilton-county-communications/contact-us/.

DSL is a technology that runs across a landline phone; therefore, we only offer it to customers that have phone service in our 7 exchanges: Belle Prairie, Belle Rive, Blairsville, Broughton, Dahlgren, Dale and Macedonia. This is an "always on" connection that is fast and reliable and allows the user to talk on the phone and to surf the Internet at the same time.

HSBoS is a new service within our Co-op Exchanges. If you reside within the Hamilton County Telephone Co-op and would prefer internet service without a landline, please call our office at 618-736-2211 for more details.

Our Wireless Internet service provides technology that can reach remote locations wirelessly by placing an antenna at your location. This is an "always on" connection that is fast and reliable. We offer wireless Internet service in Akin, Enfield, McLeansboro, and surrounding areas. Please call our office at 618-736-2242 for more details.

Information about our different service offerings can be found at https://www.hamiltoncom.net/services/about-hamilton-county-communications-3/.  The bandwidths listed are the maximum bandwidth of the service. You will not be provided additional bandwidth above what you purchased, even for short periods of time, and you are not permitted to "burst" traffic above your purchased bandwidth.

The bandwidth you purchase (your service package or nominal bandwidth) is the maximum bandwidth available to you. Unless you have purchased a Committed Bandwidth service that

specifically guarantees a fixed bandwidth, such as a T-1 circuit, it is not a guaranteed bandwidth. We will make our best effort to transmit your data in a timely fashion; however, we do not guarantee that you will be able to use your entire nominal bandwidth at any given time. This is referred to as "best effort" service.

All our broadband services are best effort. The best effort services above may be suitable for real-time applications if the customer has purchased adequate bandwidth for that service. Disruption during times of congestion, if any, you experience will be minimized if you purchase adequate bandwidth for the services you wish to use. However, since there are occasionally conditions of extreme congestion at various points in the Internet, including our network, unless you have purchased a Committed Bandwidth service that specifically guarantees a fixed bandwidth, such as a T-1 circuit, we do not guarantee that your service will never be degraded. Note that bandwidth requirements will differ by real-time application. For example, video such as that offered by various services such as YouTube may require somewhat less total bandwidth than entertainment quality streaming video. Bandwidth requirements may also differ among providers.

## 2. Network Performance

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.

We strive to make your total nominal bandwidth available for you to use within our network. We cannot control bandwidth available, congestion, or service quality on those parts of the Internet beyond our network. When other customers use our network, you may not be able to use your maximum nominal bandwidth because all customers share total bandwidth capacity at some points on our network and on the Internet. If the bandwidth demand of all customers at that network location exceeds the bandwidth capacity provided, you may not be able to use your entire nominal bandwidth.

All services other than Committed Bandwidth services are "shared services" used by many customers. We size our Internet services by the bandwidth of all our customers, including your service, based on best engineering practices. Service is provided equally to all customers, and every customer's data has an equal chance to be served.

On a downstream basis (Internet to customer), service is provided equally to all customers, Internet services, protocols, and sources or destinations on the Internet, such as websites, e-mail servers, etc. Due to limited bandwidth capacity on an upstream basis (customer to the Internet), service is provided equally to all customers, protocols, and sources or destinations on the Internet, such as websites, e-mail servers, etc., except that service types are prioritized to provide the best service possible to all customers.

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.

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) |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

### 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.

We prioritize services, with normal web browsing and VOIP being the highest priority, followed by all other services. Service is not prioritized by the customer or source or destination on the Internet. No services, protocols, or legal sources and destinations on the Internet are blocked

under any circumstances. Any effects on service may only be noticeable in times of significant congestion.

## 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.hamiltoncom.net/services/about-hamilton-county-communications-3/ or at [page coming soon!]. 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. We inspect packets of data you send or receive over our network to allow us to route and, where applicable, prioritize data. We inspect only the packet headers that tell us where to send your data and the type of data it is, i.e., web surfing, video, file transfer, etc. We do not examine the content of your data, i.e., the data you send or receive, such as the messages from and to e-mail addresses of your e-mail, which websites you visit, the sources of your video, or the contents of files you send or receive.

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.hamiltoncom.net/wp-content/uploads/2024/09/Privacy-Policy-Hamilton-2024.pdf].

### 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 contact us at:

**Hamilton County Telephone Co-op:**
Office Phone: 618-736-2211
Office Fax: 618-736-2616

**Hamilton County Communications, Inc.:**
Office Phone: 618-736-2242
Toll-Free Number: 800-447-8725
Office Fax: 618-736-2616