

Broadband Internet Access Services Network Management Practices, Performance Characteristics, and Commercial Terms and Conditions for Fixed Services

Hillsboro Telephone Company, Inc. (“the Company”) has adopted the following network management practices, performance characteristics, and commercial terms and conditions for its broadband Internet access services (“Services”) provided by the Company’s subsidiary, Verneau Networks, Inc. in compliance with the Federal Communications Commission’s (“FCC’s”) Open Internet Framework requirements (GN Docket No. 09-191 and WC Docket No. 07-52).

These practices, characteristics, terms and conditions are intended to help preserve the Internet as an open framework that enables consumer choice, freedom of expression, end-user control, competition, and freedom to innovate without permission, while permitting the Company to manage its network reasonably.

The Company may add, delete, or modify certain practices, performance characteristics, terms and conditions from time to time at its discretion. The Company will provide as much advance notice as practicable of such changes. It will normally endeavor to furnish written notice of changes thirty (30) days before changes become effective, but reserves the right to use a shorter notice period when regulatory, operational, technical or other circumstances warrant.

I. Network Management Practices

The Company manages its network with the goal of providing the best practicable broadband Internet experience to all of its customers. Within the scope of its resources, it attempts to deploy and maintain adequate capacity and facilities within its own network, and to acquire sufficient Middle Mile capacity or facilities outside its service area to connect with the Internet. The Company and its staff use their best efforts to monitor, address and minimize (but do not guarantee that they can prevent) the effects of spam, viruses, security attacks, network congestion, and other phenomena that can degrade the service of affected customers.

Use of the Service is subject to the Company’s Broadband Usage Policy, set out in the Company’s Agreement for Internet Access Service, which may be viewed at <https://www.hillsborotel.com/policies> . That policy is incorporated herein as if set forth at length.

The Company reserves the right to engage in reasonable network management practices, in addition to and notwithstanding our Broadband Usage Policy and the security measures described below, to protect its network from harm, compromised capacity, degradation in network performance or service levels, or uses of the Service which may adversely impact access to or the use of Service by other customers. Reasonable network management practices that the Company may adopt include, but are not limited to: (i) a cap on data usage; (ii) modification of serving facility or service technology; and/or (iii) a modification of or a limitation on data throughput speed or data consumption.

A. Congestion Management Practices

Congestion is an Internet access service problem that can slow web browsing, downloading, and other activities of the customers during certain peak usage periods. Congestion may be caused by capacity limits and bottlenecks in a service provider’s own network, or by limitations in the capacity of the Middle Mile transport facilities and services that many rural service providers must purchase from unrelated entities to carry the traffic of their customers between their service areas and the closest Internet nodes.

The Company has experienced no recent problems with congestion.

The Company does not at this time implement any congestion management techniques, except the usage allowances of the lesser of 75 Gigabyte downstream and 100 Gigabyte upstream per billing cycle, as described in the Company’s Broadband Usage Policy included in its Agreement for Internet Access Service, which may be viewed at <https://www.hillsborotel.com/policies> .

If significant congestion problems arise in the future, the Company's approach will be to determine the source of the problem, and to increase the capacity of the affected portions of its network and/or of its Middle Mile routes where warranted. In the event of congestion, all traffic is classified as best efforts.

B. Application-Specific Behavior Practices

The Company does not favor or inhibit certain applications or classes of applications. Customers may use any lawful and commercially available application which they desire on the Company's network.

The Company does not normally monitor the contents of the traffic or applications of its customers. The Company undertakes no obligation to monitor or investigate the lawfulness of the applications used by its customers.

The Company does not modify protocol fields in ways that are not prescribed by the applicable protocol standards.

C. Device Attachment Rules

The Company does not have any approval procedures that must be satisfied before a device can be connected to its network. Customers may use any lawful, compatible, type-accepted (if necessary) and commercially available device which they desire on the Company's network, as long as such device does not harm the network.

The Company does not normally monitor the devices used by its customers. It warns customers that some types of devices (for example, Data Over Cable Service Interface Specification ("DOCSIS") devices intended for use on cable broadband networks) are not compatible with the Company's fiber optic and digital subscriber line ("DSL") network.

The Company undertakes no obligation to monitor or investigate the lawfulness of the devices used by its customers.

D. Security Practices

The Company does not normally monitor the traffic of its customers. It undertakes no obligation to monitor or protect such customer traffic from spam, viruses, denial-of-service attacks, or other malicious, unlawful or unwanted activities.

The Company recognizes that customers can purchase spam filtering and anti-virus software from commercial vendors to meet their needs. The Company may from time to time offer anti-spam and/or anti-virus software or services to customers who desire to purchase them from the Company. When offered, these software or services will be described and priced in other sections of this website. Customers are free to obtain anti-spam and/or anti-virus software or services from any source they desire, as long as such software or services do not disrupt or degrade the traffic of other customers of the Company or harm the network.

The Company does engage in security measures, consistent with industry standards, intended to protect the network and the Company's customers. The Company does not guarantee that it can protect customers from any and/or all security breaches.

The Company does not allow customer-owned SMTP servers on its network without a static IP address. The Company specifically denies UDP/TCP ports 67, 137, 138, 139 and 445. The Company blocks outbound traffic on TCP Port 25 to any outbound email servers other than the Company's email servers in an effort to prevent email spam attacks originating from compromised customer devices on the network.

In the event of denial of service attacks, spoofing or other malicious traffic, the Company will implement inbound and outbound traffic filtering and/or blocking on specific source and destination IP addresses. These actions will be performed to ensure reliability and availability of the Company's network. These actions will not be utilized for normal Internet applications and traffic. In the case of any suspicious or malicious network

activity, notification and forensic information will be made available to the appropriate law enforcement and network security resources for investigation.

E. Traffic Blocking

The Company does not block any lawful content, applications, devices, and/or non-harmful devices. The only potential exceptions where blocking may occur entail the unlawful or harmful circumstances set forth in Sections I.A through I.D above. The Company believes that all such circumstances constitute reasonable network management practices.

The Company does not knowingly and intentionally impair, degrade or delay the traffic on its network so as to render effectively unusable certain content, applications, services and/or non-harmful devices. However, the Company notes that congestion may from time to time impair, degrade, or delay some traffic.

The Company does not charge edge service providers of content, applications, services and/or devices any fees simply for transporting traffic between them and its customers.

II. Performance Characteristics

Many of the service and performance characteristics of the Company's Services are contained in The Company's Agreement for Internet Access Service, which can be viewed at <https://www.hillsborotel.com/policies>. The Company offers different tiers of service at different prices, and changes these from time to time.

A. Performance

The Company offers upload and download speeds of up to the rates shown below:

Residential DSL Internet Services

Service Level	Downstream	Upstream
5Mb	5 Mbps	640 Kbps
10Mb	10 Mbps	640 Kbps
15Mb	15 Mbps	640 Kbps

Residential Fiber Internet Services

Service Level	Downstream	Upstream
5Mb	5 Mbps	1 Mbps
10Mb	10 Mbps	1 Mbps
15Mb	15 Mbps	1 Mbps
25Mb	25 Mbps	3 Mbps

Based on the best information available to the Company, in tests it has conducted by contacting the FCC's broadband speed test website at <https://www.measuringbroadbandamerica.com> with a netbook PC connected to the type of modem the Company provides to its residential Internet DSL service customers, the average upload and download speeds for each tier during a typical weekday night between 7:00 pm and 11:00 pm is as shown below:

Average Residential DSL Internet Tests

Service Level	Downstream	Upstream
5Mb	5.3 Mbps	640 Kbps
10Mb	10.4 Mbps	640 Kbps
15Mb	15.5 Mbps	640 Kbps

Average Residential Fiber Internet Tests

Service Level	Downstream	Upstream
5Mb	5.5 Mbps	1 Mbps
10Mb	10.5 Mbps	1 Mbps
15Mb	15.5 Mbps	1 Mbps
25Mb	25.5 Mbps	3 Mbps

Jitter and Latency Tests

<i>Jitter Average</i>	<i>Latency Average</i>
<i>DSL 0 ms</i>	<i>DSL <3 ms</i>
<i>Fiber 0 ms</i>	<i>Fiber <1 ms</i>

Actual access speeds and latency are impacted by the length, capacity and congestion of Middle Mile transport facilities (between the Company's service area and Internet nodes) as well as the characteristics of the Company's own network. The Company offers a speed test site to any user or customer. It can be accessed at <https://www.measuringbroadbandamerica.com>.

The Company's service is suitable for real-time applications. The speed tier a customer subscribes to will impact the efficiency of the real-time applications.

B. Impact of Specialized Services

The Company does not offer specialized services to end-users.

III. Commercial Terms and Conditions

The commercial terms and conditions of the Company's Services are contained in greater detail in Agreement for Internet Access Service, which can be viewed at <https://www.hillsborotel.com/policies>. The following is a brief overview or reference to terms and conditions detailed elsewhere, plus discussions of other terms and conditions required by the FCC's Open Internet Framework.

A. Pricing Terms and Conditions

The Company offers different tiers and levels of service at different prices, and changes these from time to time. These service tiers and prices are detailed in the Agreement for Internet Access Service.

The Company does impose fees for early termination with respect to certain of its service arrangements.

The Company is willing to consider and negotiate prices for customized additional network services requested by specific customers or edge service providers if such services can be designed, developed and furnished in a commercially reasonable manner. If and when such customized services are developed and furnished, the Company reserves the right to adapt and provide them to other customers on a non-discriminatory basis so long as such subsequent provision does not entail disclosure of proprietary or confidential information of the initial customer.

B. No Unreasonable Discrimination

The Company does not unreasonably discriminate in its broadband Internet transmission of traffic of its customers. The Company endeavors to give its customers as much choice and control as practicable among its different service offerings and among the content, application, service and device offerings of edge service providers. When reasonable network management practices entail differential treatment of traffic, the Company does not discriminate among specific uses, or classes of uses, of its network.

The Company does not impair, degrade or delay VoIP applications or services that compete with its voice services and those of its affiliates.

The Company does not impair, degrade, delay or otherwise inhibit access by its customers to lawful content, applications, services or non-harmful devices.

The Company does not impair free expression by actions such as slowing traffic from particular websites or blogs.

The Company does not use or demand “pay-for-priority” or similar arrangements that directly or indirectly favor some traffic over other traffic.

The Company does not prioritize its own content, application, services, or devices, or those of its affiliates.

C. Privacy Policies

As indicated above, the Company’s network management practices do not generally entail inspection of network traffic.

The Company retains and stores certain traffic information (such as the identity of the customer using a particular IP address during a specific period) for time periods required by federal or state law.

The Company retains, stores and provides to law enforcement any traffic information requested pursuant to the procedures of the Communications Assistance for Law Enforcement Act (“CALEA”), the Foreign Intelligence Surveillance Act (“FISA”) or other applicable national security or criminal statutes.

The Company may collect personal information about users of its Services. The Company may also gather some information through its relationship with customers, such as information about the quantity, technical configuration, type, destination and amount of use of the Services. Information in the Company’s billing and customer care systems concerning a customer’s account and use of Service belongs to the Company, and you have no expectation of privacy with respect to such information.

You can find out how the Company uses, protects and discloses the information it collects about you in the Company’s Privacy Policy, available at <https://www.hillsborotel.com/policies> . The Company does not collect, store or use traffic information to profile its customers in order to sell additional services to them, or for similar non-network management purposes.

D. Redress Options

Questions and complaints regarding the foregoing matters should be addressed to the Company at 608-489-3230 or info@hillsborotel.com . The Company strongly desires to resolve questions, complaints and other problems of its customers and edge service providers in an informal and direct manner that satisfies all interested parties to the greatest extent practicable.

Customers and edge service providers that are not able to obtain satisfaction from the Company have the option of invoking the FCC’s informal and formal complaint procedures regarding Open Internet Framework disputes.

Last reviewed:

June 3, 2017