

Interstate Telecommunications Coop, Inc.

NETWORK MANAGEMENT POLICY & TRANSPARENCY Statement

Interstate Telecommunications Coop, Inc. (“Interstate” or “Company”) provides this Network Transparency Statement in accordance with the FCC’s Restore Internet Freedom Rules (RIF) to ensure that you have sufficient information to make informed choices about the purchase of broadband services. Information about Interstate’s other policies and practices concerning broadband are available at www.itc-web.com (“Interstate Website”).

Interstate engages in network management practices that are tailored and appropriate for achieving optimization on the network considering the particular network architecture and technology of its broadband Internet access service. Interstate’s goal is to ensure that all of its customers experience a safe and secure broadband Internet environment that is fast, reliable and affordable. Interstate wants its customers to indulge in all that the Internet has to offer, whether it is social networking, streaming videos and music, to communicating through email and videoconferencing.

Interstate’s network management includes congestion and security protocol management and customers generally will not be impacted by the protocols and practices that Interstate uses to manage its network.

A. Interstate’s Network Management Practices:

Interstate uses various tools and industry standard techniques to manage its network and deliver fast, secure and reliable Internet service. Interstate believes in full transparency and provides the following disclosures about its network management practices:

- 1. Blocking:** Interstate does not block or discriminate against lawful content.
- 2. Throttling:** Interstate does not throttle, impair or degrade lawful Internet traffic.
- 3. Affiliated Prioritization:** Interstate does not prioritize Internet traffic and has no plans to do so.
- 4. Paid Prioritization:** Interstate has never engaged in paid prioritization. We don’t prioritize Internet for consideration to benefit particular content, applications, services or devices. Interstate does not have plans to enter into paid prioritization deals to create fast lanes.
- 5. Congestion Management:** Interstate monitors the connections on its network in the aggregate on a daily basis to determine the rate of utilization. If congestion emerges on the network, Interstate will take the appropriate measures to relieve congestion. On Interstate’s network, all customers have access to all legal services, applications and content online and, in the event of congestion, most Internet activities will be unaffected.

Some customers, however, may experience longer download or upload times, or slower surf speeds on the web if instances of congestion do occur on Interstate's network.

Customers using conduct that abuses or threatens the Interstate network or which violates the company's Acceptable Use Policy, Internet service Terms and Conditions, or the Internet Service Agreement will be asked to stop any such use immediately. A failure to respond or to cease any such conduct could result in service suspension or termination.

Interstate's network and congestion management practices are 'application-agnostic', based on current network conditions, and are not implemented on the basis of customers' online activities, protocols or applications. Interstate's network management practices do not relate to any particular customer's aggregate monthly data usage.

Interstate monitors its network on a daily basis to determine utilization on its network. Interstate also checks 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, Interstate provides notification to the customer via email or phone. If a violation of Interstate's policies has occurred and such violation is not remedied, Interstate will seek to suspend or terminate that customer's service.

6. Application-Specific Behavior: Except as may be provided elsewhere herein, Interstate does not currently engage in any application-specific behaviors on its network. Customers may use any lawful applications with Interstate.

7. Device Attachment Rules: Interstate deploys Internet access to its subscribers through hardwired broadband access via Digital Subscriber Line (XDSL) and Fiber-to-the-Home (FTTH) technologies. Customers using FTTH and VDSL technologies must use Dynamic Host Configuration Protocol (DHCP) for authentication of point to point connections between devices on the network. There is a limit of one (1) DHCP session per account. Customers using ADSL must use Point-to-Point Protocol over Ethernet (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, DSL modems, wireless modems, or other proprietary network gateways used on the Interstate broadband network should be provided by Interstate. Customers may attach devices of their choosing to their modems, including wired or wireless routers, laptops, desktop computers, video game systems, televisions, or other network-enabled electronics equipment. However, *customers* are responsible for ensuring that their equipment does not harm Interstate's network or impair the service of other customers. Interstate is not responsible for the functionality or compatibility of any equipment provided by its customers. Customers are responsible for securing their own equipment to prevent unauthorized access to Interstate's broadband network by third parties and will be held responsible for the actions of such third parties who gain unauthorized access through unsecured customer equipment.

8. Network Security: Interstate knows the importance of securing its network and customers from network threats and annoyances. The company promotes the security of its network and patrons by protections from such threats as spam, viruses, distributed denial of service (DDoS), firewall issues, and phishing schemes. Interstate also deploys spam filters in order 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 the spam files through the email. Spam files are automatically deleted if not accessed within 30 days.

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

B. Network Performance

1. Service Descriptions

Interstate deploys Internet access to its subscribers through hardwired broadband access via Digital Subscriber Line (XDSL) or Fiber-to-the-Home (FTTH) technologies. DSL is a wireline transmission technology that transmits data faster over traditional copper telephone lines already installed to homes and businesses. FTTH utilizes fiber optic cable to deliver telephone, data and video services to customer locations.

2. Network Performance

Interstate makes 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 Interstate' network. Interstate measures availability, latency, and aggregate utilization on the network and strives to meet internal service level targets.

However, the bandwidth speed at which a particular distant website or other Internet resources may be downloaded, or the speed at which your customer information may be uploaded to a distant website or Internet location is affected by factors beyond Interstate' control, including the speed of the connection from a distant web server to the Internet, congestion on intermediate networks, and/or limitations on your own computer equipment, including a wireless router. In addition, your service performance may be affected by the inside wiring at your premise. Accordingly, you, the customer, must consider the capabilities of your own equipment when choosing a Interstate broadband service. Your computers and/or wireless or other networks in your homes or offices may need an upgrade in order to take full advantage of the chosen Interstate broadband plan.

Interstate tests 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://speed.itctel.com> on Interstate's website

and may request assistance by calling our business office at 800-417-8667 or by email at info@itctel.com.

Based on the network information Interstate receives from its monitoring efforts, Interstate’ network is delivering data transmission rates advertised for the different high-speed Internet services. To be sure, Interstate has implemented a program of testing the performance of its network by using a test protocol similar to the one sanctioned by the FCC. We installed specific network performance monitoring protocol at aggregation points across our network and conducted a series of tests using this equipment. Interstate reports the results of this testing below. This result applies to both upload and download data rates, and applies for measurements made both at peak times and over a 24-hour period:

DOWNLOAD & UPLOAD SPEEDS:

Download Speeds

ADVERTISED	ACTUAL SUSTAINED	PERCENTAGE DIFFERENTIAL
15Mbps	15.286Mbps	+1.9%
30Mbps	29.489Mbps	-1.7%
50Mbps	50.843Mbps	+1.7%
100Mbps	100.126Mbps	+0.13%

Upload Speeds

ADVERTISED	ACTUAL SUSTAINED	PERCENTAGE DIFFERENTIAL
3Mbps	3.804Mbps	+26.8%
5Mbps	5.726Mbps	+14.5%
10Mbps	10.431Mbps	+4.3%

Typical Latency	6 milliseconds
Typical Packet Loss	0%

Interstate’s packages are suitable for most real-time applications. Interstate recommends FTTH Internet for optimal real-time application experience. For questions about your specific real-time application please contact Interstate’s Broadband Department.

3. Impact of Non-BIAS Data Services

The FCC has defined 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. At this time, Interstate is not offering any non-BIAS data services

C. Commercial Terms

Interstate’s Internet service is priced on a flat-fee basis (plus taxes). Interstate does not charge end users a usage-based fee for Internet service. Pricing and additional service information may be found [here](#).

In addition to this Network Management/Transparency Statement, patrons may also find links to the following on the Interstate Website:

- [Privacy Policy](#)
- [Frequently Asked Questions \(“FAQs”\)](#)
- [Acceptable Use Policy](#)

For questions, complaints or requests for additional information, please contact Interstate at:

Interstate Telecommunications Cooperative, Inc.
P.O. Box 920
Clear Lake, SD 57226
Phone: 800-417-8667
Email at helpdesk@itctel.com

Further, if you believe that Interstate is in violation of the FCC’s Open Internet Rules, you may file either an informal or formal complaint with the FCC. <http://esupport.fcc.gov/complaints.htm>

Updated: June 2018