



Waldron Communication Company Network Management Practices Policy Disclosure

Waldron Communication Company (WCC) has adopted the following network management practices, performance characteristics, and commercial terms and conditions for its broadband Internet access services 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 WCC to manage its network reasonably. WCC may revise its Network Management Practices Policy from time to time.

Network Management Practices

WCC utilizes reasonable and responsible network management practices that are consistent with industry standards, and that are tailored to achieve legitimate network management purposes. Because WCC has limited bandwidth, it reasonably manages its network to facilitate Internet usage by all of its customers. WCC uses reasonable and responsible network management practices in an effort to prevent spam, viruses, security attacks, network congestion and other risks that threaten to degrade service.

Congestion Management

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. WCC constantly monitors its network to manage congestion avoiding over utilization of circuits. If significant congestion problems arise, WCC's approach is 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 neutral until congestion passes.

Application-Specific Behavior

WCC does not favor or inhibit applications or classes of applications. Customers may use any lawful and commercially available application. The WCC network does not discriminate against particular types of content. Peer to Peer, streaming video, VoIP, and video downloads are all classified as content neutral.

WCC does not normally monitor the contents of the traffic or applications of its customers. It undertakes no obligation to monitor or investigate the lawfulness of the applications used by its customers. If any party contacts WCC with a substantial allegation that an application being used by a customer is unlawful, WCC will investigate the matter (including consultation, as it deems appropriate, with attorneys, consultants, federal or state regulators, and/or federal, state or local law enforcement agencies), and will take appropriate actions to deal with the use of applications that are demonstrated to be unlawful.

Device Attachment Rules

Only devices that conform to publicly available industry standards, and that are not harmful to WCC's network, are approved for use. WCC reserves the right to disable devices that cause disruptions to WCC's customers or that are not in compliance with industry standards. In the event that WCC disables a device or denies access to application providers, prompt notice will be given of the decision to deny access to the network or disable a device.

Security

WCC provides customers with unrestricted access to all of the lawful content, services, and applications available on the Internet. WCC uses industry standard tools and utilizes best practices and policies to protect customers from spam, phishing, and other unwanted or harmful online content. When WCC identifies harmful or unwanted online content, it may prevent delivery of such content to customers, or customers may be permitted to identify or inspect content to determine if it is harmful or unwanted. WCC security methods are not intended to prevent end-users from running any specific applications.

WCC employs commercially appropriate security procedures to protect its network and its customer records from unauthorized access by third parties. WCC does not guarantee that it can protect customers from any and/or all security breaches.

Performance Characteristics

Service Description. The advertised speed of WCC's Internet service is the maximum bandwidth throughput that is available and achievable with the technology utilized by Company. Advertised speeds/latencies can be found in our Broadband Labels located at www.wcomco.net. Our customer serving networks are comprised of various access platform technologies that deliver Internet service. Some characteristics of generally available Internet access by type:

FTTP (Fiber-to-the-premise) supports up to 400 Mbps, less than 50ms latency, depending on the service level subscribed.

Several factors may affect the actual bandwidth throughput of Company's Internet service offerings. This includes but is not limited to distance between service point and Company's central office as well as the customer's computer, modem or router used. Internet traffic and activity during peak usage periods may also impact the available bit rate.

Commercial Pricing

In order to meet the usage and budgetary needs of all of our customers, WCC offers a wide selection of Internet access plan options, including promotional offerings, bundled service choices, and a la carte alternatives.

To find out about WCC's pricing on Internet services, visit our website at: <http://www.wcomco.net/> , or call 1-888-792-7958 to speak with a customer service representative.

Early Termination Fees

If a customer previously entered into a service agreement with Provider for broadband Internet access service for a defined service term, and customer desires to terminate the service agreement prior to the expiration of that term, Provider may charge a reasonable early termination fee if such fee is clearly indicated in the service agreement.

Usage-Based Fees

WCC Internet service is priced on a flat-fee basis (plus taxes). WCC does not charge end users a usage-based fee for Internet service.

Privacy Policy

Our Privacy Policy can be found online at: www.wcomco.net. WCC does not generally inspect network traffic. WCC does not otherwise store, use, or provide traffic information for non-network management purposes or those not identified in the Privacy Policy. Certain traffic information is retained and stored for specific periods of time as required by state or federal law. This includes information stored and provided to law enforcement as it relates to information requested by law enforcement pursuant to national security and/or criminal statutes and Acts.

Contact Us

If you have any questions regarding WCC Network Management Practices Policy or would like to file a complaint regarding its network management practices, please contact us at:

Waldron Communication Company
115 South Main Street
Waldron, MI 49288
1-888-792-7958
<http://www.wcomco.net>

If you believe that WCC 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>

Additional Disclaimers

The Open Internet Rules, as adopted, and WCC Network Management Practices Policy are not intended to affect, alter or otherwise supersede the legal status of cooperative efforts by Internet access service providers and other service providers that are designed to curtail infringement in response to information provided by rights holders in a manner that is timely, effective, and accommodates the legitimate interests of providers, rights holders, and end users.

Furthermore, the Open Internet Rules, as adopted, and WCC Network Management Practices Policy do not prohibit WCC from making reasonable efforts to address the transfer of unlawful content or unlawful transfers of content.