



## **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**

WCC offers broadband Internet access service via FTTH, Digital Subscriber Line ("DSL") & Fixed Wireless. DSL is a wireline transmission technology that transmits data faster over traditional copper telephone lines already installed to homes and businesses.

The advertised speed of WCC's Internet service is the maximum speed achievable with the technology utilized by WCC. While the maximum advertised speed is attainable for end users, several factors may affect the actual speed of WCC's Internet service offerings, including, but not limited to:

the distance of the consumer's home or office from WCC's central office (*i.e.*, the further away the customer is from the central office, the slower the broadband speed), the end user's computer, modem or router, activity during peak usage periods, and other Internet traffic.

Based on internal testing, the mean upload and download speeds are 1 Mbps/4 Mbps during peak usage periods (*i.e.*, between 7:00 p.m. and 11:00 p.m. on weeknights).

Wireless	Mean	DSL	Mean	FTTH	Mean
1M dn/256 up	1294k/176k	1M dn/256 up	1266k/340k	1M dn/256 up	1117k/279k
2M dn/384 up	2010k/299k	2M dn/384 up	2413k/246k	2M dn/384 up	2487k/391k
4M dn/512 up	4041k/469k	4M dn/512 up	4668k/376k	4M dn/512 up	4329k/520k
		10M dn/1Mup	10772k/622k	10M dn/1M up	10743k/963k

WCC's internal testing, established a mean round trip latency of:

FTTH -13ms  
 DSL - 27ms  
 Wireless - 91ms

FTTH, DSL and Wireless internet services are capable of utilizing real-time internet applications, i.e. VoIP, streaming video, video downloads.

### **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**

WCC reserves the right to monitor usage rates, bandwidth, transmissions and content in order to protect the operation of the network through reasonable network management practices discussed above. WCC affords full access to lawful content, services and applications available on the Internet and does not routinely monitor, inspect or store the network activity and traffic of its Internet service users.

WCC may collect information regarding customer equipment used on the network, including, but not limited to: equipment type, serial number, settings, configuration and software. WCC may also collect performance information to examine the operation of the equipment, services and applications the customer may use on the network, URLs, data transmission rates and latencies, location information, security characteristics, and information about the amount of bandwidth and other network resources the customer is using in connection with uploading, downloading or streaming data to and from the Internet.

Network traffic, activity, performance information, and equipment information monitored or collected by WCC is done so for the sole purpose of reasonable network management purposes.

WCC Network Management Practices Policy is designed to safeguard our network and its users from spam, viruses, phishing, and other unwanted or harmful on-line content, with the intention of providing the best Internet experience possible for our 4 customers. WCC Network Management Practices are not intended, nor implemented, to block consumers from accessing the content and applications of their choice, deprive consumers of their entitlement to competition, or discriminate against or in favor of certain network traffic.

WCC is required to comply with relevant state and federal laws, regulations and judicial orders. Information may be disclosed to third parties if WCC determines, in its sole discretion that such a disclosure is necessary to protect our interest or the interests of our customer, or is required to comply with legal requirements or orders. This information may also be disclosed in connection with the sale of our business.

## **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.