

Great Plains Communications Network Management Practices Policy Disclosure

In compliance with the Federal Communications revised transparency rules effective June 11, 2018, Great Plains Communications' policies regarding network management practices are provided here in a good faith effort that our current customers, prospective customers, third-party content providers, and other interested parties can make informed choices regarding the broadband Internet access services offered by Great Plains Communications (GPC), and the extent our network management practices may affect those services.

This policy statement, in conjunction with our privacy policy, acceptable use policy, and the commercial terms and conditions provided on our main website, are aimed at meeting these objectives

GPC reserves the right to update and modify these policies and our terms and conditions as well as our network management practices from time to time. Thus, we encourage you to visit our website periodically to review our practices.

In the interest of providing the best online experience possible for all of GPC's customers, we utilize reasonable network management practices tailored to achieve legitimate network management purposes. Because bandwidth is a limited resource for GPC's broadband Internet service, it is essential that we reasonably manage our network to promote the use and enjoyment of the Internet by all of our customers.

By engaging in reasonable and responsible network management, GPC prevents its customers from being subjected to the negative effects of spam, viruses, security attacks, network congestion, and other risks that threaten to degrade service quality and performance. The network management practices employed by GPC are consistent with industry standards.

1.0 Network Management Practices

In general, GPC manages its network without regard to the specific type of Internet traffic, applications, or end user. GPC does not block or make use of any application, traffic, or end user specific network management practice. GPC does not favor, modify, inhibit, rate control (throttle) or block any specific protocols (including those used by VoIP), protocol ports or fields, or any applications or classes of applications on the basis of content, application service, or use of a non-harmful device.

GPC does not participate in "paid prioritization" to directly or indirectly favor some internet traffic over other traffic. GPC does not use techniques such as traffic shaping, prioritization, resource reservation, or other forms of preferential traffic management, either in exchange for consideration (monetary or otherwise) from a third party, or to benefit an affiliated entity.

GPC does not block lawful content, applications, services, or non-harmful devices, subject to reasonable network management. Additionally, GPC does not block users from accessing lawful websites, subject to our reasonable network management practices. Nor does GPC block applications that may compete with either GPC's or one of its affiliates voice or video service products, subject again to our reasonable network management practices.

GPC does not reasonably discriminate in transmitting lawful network traffic over a user's broadband internet access service subject to our reasonable network management practices.

GPC allows its customers to connect any ordinary and typical consumer device to GPC's network provided the device conforms to publicly available industry standards and be non-harmful to GPC's network or its customers. GPC provides modems to customers free of charge. If a customer does prefer the use of their own modem, an automatic trip charge will be applied anytime a technician needs to be dispatched. Customerowned modems will require an onsite visit since they are not visible to our network and therefore cannot be managed from a remote location and our remote service desk team.

2.0 Congestion Management

It is possible that a single customer or a relatively small number of customers may place a disproportionate demand on the network bandwidth resources, causing network congestion and an overall degradation in service quality for other end users. For this reason, if GPC's network nears a state of congestion, GPC will use congestion management practices to ensure all of GPC's customers retain access to a "fair share" of bandwidth resources.

When GPC's network nears a state of congestion, the congestion management tools, practices and/ or software employed by GPC will identify segments of the GPC network that have a predetermined, aggregated level of bandwidth usage. From there, the congestion management tools will ascertain which customer account(s) in the identified network segment is using a disproportionate share of the bandwidth. The Internet access of the identified customer account(s) may be temporarily managed or suspended until the period of network congestion passes. Customers whose Internet traffic is temporarily managed by GPC may experience slower downloads/uploads and Internet/website response times.

The congestion management practices utilized by GPC are "protocol-agnostic," meaning that the network does not manage congestion based on the online activities, protocols or applications a customer uses. Rather, GPC's congestion management practices focus only on the heaviest bandwidth users in real time.

3.0 Security

GPC offers its customers unrestricted access to all of the lawful content, services, and applications available on the Internet. We use industry standard tools, and generally accepted best practices and policies, to protect our customers from security risks such as spam, phishing, email-transported malware, and other unwanted or harmful online content and activities.

In the instances where these tools and policies identify email content as harmful or unwanted, the content may be prevented from reaching customers. Some of these tools may permit customers to identify or inspect the content to determine if it is harmful or unwanted.

In the event of Denial of Service (DoS), Distributed Denial of Service (DDoS) attack, spoofing or other malicious traffic, GPC 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 GPC 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.

4.0 Performance Characteristics

GPC offers broadband Internet access services via multiple technologies: Digital Subscriber Line (DSL), Cable Modem, Fiber to the Home (FTTH), point to point (PTP), and from a third-party satellite provider. Our predominate service offerings are provided via the DSL and Cable Modem technologies

The advertised speed of GPC'S Internet service is the maximum speed achievable via our DSL and Cable Modem internet service technologies. While the maximum advertised speed is attainable for end users, several factors may affect the actual speed of our Internet service offerings. These factors include, but are not limited to the following: the distance of the consumer's home or office from our central office (i.e., the further away the customer is from the central office, the slower the delivered broadband speed); the end user's computer, modem or router, or other connected devices (tablets, smart TVs, game consoles); higher levels of activity during peak usage periods; and other Internet traffic.

On a limited availability basis, GPC offers non-contractual Internet access services that are higher than our standard service offering cited above. The mean upload and download speeds and mean round trip latency for these Internet access connections will vary according to the specific service offerings. Please call 1-888-343-8014 to speak with a customer service representative to determine if these services are available at your location.

For detailed information about our standard service offering, please see GPC's Broadband Facts <u>https://www.gpcom.com/images/terms/Broadband_Facts.pdf</u>

5.0 Privacy Policy

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

GPC is required to comply with relevant laws, regulations and judicial orders. Information covered under this Privacy Policy, as well as other categories of information, may be disclosed to third parties if GPC determines, in its sole discretion, that such a disclosure is necessary or required.

As part of its network management practices, GPC does not distribute information on network activity and/ or traffic to any third party, or use network traffic information for any non-network management purpose. GPC's network management practices as discussed herein are intended solely to provide the best online experience possible for all of GPC's customers by safeguarding our network and its users from spam, viruses, phishing, and other unwanted or harmful online content and activities. GPC's 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. End users with questions, concerns or complaints regarding GPC's network management practices are encouraged to contact GPC for issue resolution.

6.0 Acceptable Use

GPC's acceptable use policy (AUP) is located at <u>www.gpcom.com/terms</u> and should be consulted by you. In general, however, it is not acceptable to use GPC's network for any purpose that violates local, state, or federal laws, or to transmit communications that might be high offensive or damaging to any recipients or to use the service in a manner that is unintended.

7.0 Additional Disclaimers

The Open Internet Rules, as adopted, and GPC's Network Management Practices Policy are not intended to affect, alter or otherwise supersede the legal status of cooperative efforts by broadband 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 GPC'S Network Management Practices Policy do not prohibit us from making reasonable efforts to address the transfer of unlawful content or unlawful transfers of content.

8.0 Contact Us

If you have any questions regarding GPC's Network Management Practices Policy or would like to file a complaint with us regarding our network management practices, please contact us at:

Great Plains Communications Attn: Internet Services 1600 Great Plains Centre P.O. Box 500 Blair, NE 68008 402-426-9511 402-456-6099 Email: **netlink@gpcom.net**

For additional information and any questions concerning the FCC's Open Internet Rules, you may contact the FCC directly at <u>www.fcc.gov</u>.