

## Open Internet Disclosure For Wireline and Fixed Wireless Network Services

The following policies apply to mass market broadband Internet services offered by Grafton Technologies, Inc. ("GTI"). GTI may also offer enterprise level services that can be individually tailored to specific customer needs.

It is GTI's policy to provide robust and reliable access to the Internet for all of its mass market end user customers. Because network resources are shared by all users, GTI discloses and identifies the following policies govern its Internet services. These policies are designed to:

- ensure that shared network resources are allocated fairly among all users;
- allow users and prospective users to understand service policies and any significant limitations on the service; and
- provide a foundation that assures customers that they can rely on consistently receiving the level and quality of service to which they subscribe.

GTI does not block access to, nor discriminate against, any lawful website or Internet application.

Customers are encouraged to familiarize themselves with the following policies which are deemed part of their Service Agreement. By using GTI's Internet service, the customer accepts, agrees to be bound by and to strictly adhere to, these policies. The customer also agrees to be responsible for compliance with these policies by third parties, such as friends, family members or guests that make use of the customer's service accounts or equipment to access the network for any purpose, with or without the permission of the customer.

A full list of GTI Terms of Service are available in the Company's Acceptable Use Policy <https://www.gtec.com/gti-acceptable-use-policy/>.

I. INTERNET ACCEPTABLE USE POLICIES ("AUP") for Internet services are available at:

<https://www.gtec.com/gti-acceptable-use-policy/>

## II. NETWORK MANAGEMENT; RELATED DEVICE AND PRIVACY POLICIES

**Device Attachment Rules.** With respect to GTI's fixed location broadband services, users may generally attach the devices of their choice and run the applications of their choice, subject to the limitations of the terms of their service agreement and AUP. GTI is not responsible for the compatibility, suitability or functionality of any equipment that is provided by the customer or any third party, and the customer remains fully responsible for ensuring that any such equipment does not cause any harm to the network or degrade the service of other users. All users are fully responsible for securing their equipment, including wireless routers, to prevent unauthorized access to the network by third parties and will be held fully responsible for the Actions of such third parties that gain unauthorized access to the network through unsecured end user equipment

**Privacy Policy.** GTI collects personally identifiable information in order to proactively monitor network health, to troubleshoot fixed broadband service issues, and to bill for these services. GTI does not

collect any information concerning the customer's visited websites, application usage or other Internet activity, for any other purpose than to monitoring network health.

GTI's network management practices does not generally entail inspection of network traffic, except for purposes mentioned above. 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 does not collect, store or use traffic information to profile its customers with the intent of selling or monetizing such information.

### III. COMMERCIAL TERMS

**Pricing.** Please see <https://www.gtec.com/products-and-services/> for detailed information the range of broadband product offered by the company. These plans and pricing are subject to change without notice, and do not include special assemblies that may be necessary to meet unique customer situations.

The company also offers resold satellite internet services the company offers are described at <https://www.gtec.com/exede-satellite-internet-for-our-rural-customers-2017/>. These plans and pricing are also subject to change without notice. The GTI web site publishes Viasat's installation, leasing, Terms and Conditions, and pricing information as provided by that company.

**Redress Options.** All end users and edge providers that have questions or complaints regarding broadband service should contact the GTI business office at 618-639-4841, or by email at [info@gtec.net](mailto:info@gtec.net) ("Edge Provider" refers to any content, application, service, and device provider, which generally operates at the edge rather than the core of the network.)

If a customer believes that these open Internet rules are not being met, the customer may file an informal complaint at the Federal Communications Commission. The FCC urges customers to submit any complaints via its website at the following address: <http://esupport.fcc.gov/complaints.htm>. Customers may also file a formal complaint at the FCC using Part 76 of the Commission's rules.

### IV. ISP Disclosure

The Federal Communications Commission (FCC) issued rules requiring ISPs to disclose network management practices, performance, and commercial terms of their broadband Internet access services. GTI's disclosure includes information required by paragraphs 218-223 of the [Restoring Internet Freedom Order](#).

**No blocking.** GTI does not block lawful content, applications, services, or non-harmful devices.

**Throttling.** GTI does not degrade or impair access to lawful Internet traffic on the basis of content, application, service, user, or use of a non-harmful device.

**Affiliated Prioritization.** GTI does not directly or indirectly favor some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, to benefit an affiliate.

**Paid Prioritization.** GTI does not directly or indirectly favor some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, in exchange for consideration, monetary or otherwise.

**Congestion Management.** GTI utilizes a redundant network architecture that is designed to provide users with true broadband speeds and reliability even during times of GTI demand. The network has been constructed to meet projected traffic demands and is fully scalable to allow for capacity to be added to meet customer needs and to support newly developing and increasingly sophisticated applications well into the future. However, congestion can occur on any IP network, and, when it does, packets can be delayed or dropped, leading to service degradation and delays. Because core network resources are shared by all end users, GTI has implemented a traffic management policy that is designed to ensure that all users are able to utilize their fair share of network resources during periods of high demand.

GTI has not currently implemented any network congestion management practices related to its customers' bandwidth use. However, GTI reserves the right to implement such practices in order to deliver the best possible Internet service to its customers and to be able to otherwise reasonably manage its network. In the event such network management practices are implemented, GTI will update this Disclosure Statement.

**Application-Specific Behavior.** Prioritization of packets can be used for other purposes as well, such as to ensure the reliability of applications that demand real time or near real time communications such as public safety communications and, in the context of mobile data services, E-911 communications. Generally, provisioned data speeds for GTI's mass market services are sufficient to support such applications as Voice over IP (VoIP), gaming, web surfing, or most streaming video. However, because GTI's residential, mass market broadband service generally does not prioritize such traffic; it is possible that certain applications requiring real time communications may perform at less than optimal levels, especially during periods of GTI network demand.

GTI operates secure data networks protected by industry standard firewall and password protection systems, for its own internal use. Our security and privacy policies are periodically reviewed and enhanced as necessary and only authorized individuals have access to the information provided by our customers. In addition, GTI may identify spam and prevent its delivery to customer email accounts, detect malicious Internet traffic and prevent the distribution of viruses or other harmful code or content and use other tools and techniques that may be required to implement in order to meet its goal of delivering the best possible broadband Internet experience to all of its customers

**Specialized Services.** GTI currently does not provide any services that impact its Internet access service in terms of bandwidth or service quality. If, at some point in the future GTI begins providing such services, an update to this Disclosure Statement will be posted.

**Security.** We employ remote administration address filtering & Network address translation on most GTI-owned Customer premise equipment to offer a minimal layer of security from hacking. No other end-user

security measures are taken and all security related measures are the responsibility of the end-user. Public IP addresses may be requested and users of such are responsible for all anti-hacking security.

The company's privacy policy statements are included within its AUP, shown above.

**Performance Characteristics.** GTI provides residential and commercial mass market customers with a choice of data plans to meet their needs. GTI also provides enterprise level Internet services that are custom tailored to a specific project and individually priced based on the needs and criteria established by the Enterprise customer. GTI's Internet speeds were calculated based upon speed tests conducted within the GTI network and cannot take into account latencies to reach any specific site beyond network it owns and controls.

GTI states clearly to all prospective customers of resold satellite-based internet services that the control of certain parameters of these services are controlled by the satellite providers, and not by GTI. These are clearly spelled out in the service information and brochures made available at point of sale, and over applicable internet links. The Company publishes satellite provider information specifically meant to foster transparency issues prospective customers are likely to have at <https://www.gtec.com/exede-satellite-internet-for-our-rural-customers-2017/>. GTI offers these services in rural areas where the Company's landline facilities may not be adequate for customers' purposes, and is careful to point out such services are offered by another provider.

Broadband Service is provided using multiple access mediums.

- On copper broadband connections, speeds are dependent on packages taken by customer. Latencies within our own network of 50ms or less can be expected and achieved speeds at more than 80% of advertised speed.
- On Fiber Optic broadband connections, observed speeds are dependent on packages taken by customer. Latencies within our own network of 50ms or less can be expected and achieved speeds at more than 90% of advertised speed.
- On resold satellite-originated broadband connections, subscribers should rely on the provider's own policies, as described and listed above

Internet speeds within the GTI network may be measured by performing speed tests at any of the following URL: <http://www.speedtest.net>.

While GTI provisions its network and equipment to ensure that its customers can enjoy the speeds to which they subscribe, Internet speeds generally result from a "best effort" service and are dependent on a number of variables, many of which are outside the control of an Internet Service Provider. Due to these variables, GTI is not responsible for Internet speeds beyond its own network. Such variables include: the age and processing capability of the user's terminal device or computer; the number of applications running simultaneously; the presence of viruses or malware; whether the terminal equipment is connected to the network by wire or by wireless; the distance the data packets must travel between the user and the website; the presence of congestion on and technical configuration of any intervening networks; any gating or congestion management schemes employed by websites to limit download or upload speeds in cases where multiple users are served simultaneously. GTI does not guarantee that a customer will achieve the speeds set forth above at all times. Rather, the foregoing

data speeds represent the best information available to GTI of the typical speeds a customer can expect to experience under normal operating conditions.

Speed tests that allow customers to test the upload, download and latency performance of their broadband data services are available free of charge from a number of sources. Generally, these tests are influenced by the same variables that affect Internet speed set forth above. Accordingly, the speed results would not be expected to match a test of GTI's network conducted under laboratory conditions. Please note, however, that all speed tests use different methodologies to calculate Internet connection speed so each of the tests would be expected to yield different results. Accordingly, each of these tests should be viewed as a helpful guide rather than as a definitive measurement of performance.

**Impact of Non-broadband Internet Access Specialized Services.** GTI may offer an Internet Protocol-voice-based service (VoIP) to customers with GTI broadband service which, due to the product's sensitivity to latency, may offer a quality of service treatment on the network where it is available. This treatment of VoIP traffic should have no material impact on capacity or bandwidth availability for Broadband Internet Access, because the customer has been sold an appropriate speed of service.

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