

Open Internet Disclosure for Wireline Network Services

The following policies apply to mass market broadband Internet services offered by MTCO Communications, Inc. ("MTCO"). MTCO also offers enterprise level services that can be individually tailored to customer needs.

It is MTCO'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, MTCO discloses and identifies the following policies govern its mass market Internet service. 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.

MTCO 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 MTCO'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 MTCO Terms of Service are available at

https://www.mtco.com/main/support/docs/service_agreement.pdf and https://www.mtco.com/main/support/docs/MTCO_Residential_Data_Plans_FAQ.pdf.

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

https://www.mtco.com/main/support/docs/MTCO_AUP.pdf

II. NETWORK MANAGEMENT; RELATED DEVICE AND PRIVACY POLICIES

Device Attachment Rules. With respect to MTCO'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. MTCO 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. MTCO collects personally identifiable information in order to proactively monitor network health, to troubleshoot fixed broadband service issues, and to bill for these services. MTCO does not collect any information concerning the customer's visited websites, application usage or other Internet activity, for any other purpose in the normal course of business.

MTCO'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.

The MTCO Communications Privacy Policy is available at:

https://www.mtco.com/main/support/docs/MTCO_Privacy_Policy.pdf

III. COMMERCIAL TERMS

Pricing. Please see <https://www.mtco.com/?internet&high-speed-internet> 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.

Redress Options. All end users and edge providers that have questions or complaints regarding broadband service should contact the MTCO business office at 800-859-6826 or <https://www.mtco.com/?main&contact>. ("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. MTCO's disclosure includes information required by paragraphs 218-223 of the [Restoring Internet Freedom Order](#).

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

Throttling. MTCO 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. MTCO 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. MTCO 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. MTCO utilizes a redundant network architecture that is designed to provide users with true broadband speeds and reliability even during times of peak 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, MTCO 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.

MTCO has not currently implemented any network congestion management practices related to its customers' bandwidth use. However, MTCO 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, MTCO 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 MTCO's mass market services are sufficient to support such applications as Voice over IP (VoIP), gaming, web surfing, or most streaming video. However, because MTCO'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 peak network demand.

MTCO operates secure data networks protected by industry standard firewall and password protection systems. 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, MTCO 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 OC 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. MTCO 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 MTCO 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 MTCO-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 full Privacy Policy is available at:

https://www.mtco.com/main/support/docs/MTCO_Privacy_Policy.pdf

Performance Characteristics. MTCO provides residential and commercial mass market customers with a choice of data plans to meet their needs. MTCO 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. MTCO's Internet speeds were calculated based upon speed tests conducted to speed test servers on the MTCO network.

Broadband Service is provided using multiple access mediums.

- On copper/ADSL2+/VDSL broadband connections, observed speeds are dependent on packages taken by customer. Latencies 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 of 50ms or less can be expected and achieved speeds at more than 90% of advertised speed.
- On CLEC resold local loops of Incumbent local service providers AT&T-Illinois and Frontier North, Inc., subscribers should expect observed speeds latencies of 100ms or less can be expected and achieved speeds at more than 80% of advertised speed.

Internet speeds within the MTCO network may be measured by performing speed tests at the following URL: <http://mtco-metamora.speedtest.net/>.

While MTCO 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, MTCO 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. MTCO 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 MTCO 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 MTCO'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. MTCO offers IP-based video and may offer an Internet Protocol-voice-based service (VoIP) to customers with MTCO broadband service which,

due to the product's sensitivity to latency, receives quality of service treatment on the network where it is available. This treatment of IP-video and 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.

Customers purchasing these services may experience a higher quality of service through improved latency for IP-video and voice packets carried over the Internet network. This higher quality of service is enabled through Type of Service capabilities at the customer modem and in limited network equipment deployed across the MTCO high speed Internet network.

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