

Network Management Policy

The following Company disclosures are in reference to the FCC Open Internet Rules

Service Offerings: Company directly offers broadband ISP services through NETINS in its markets. Please visit the Company website to check availability, speed options and pricing.

Performance: INS is the internet upstream provider for Company. INS offers a speed test site to any user or customer. It can be accessed here: www.palotelephone.com Internet Speed Test. These tests are heavily dependent on a customer's home network configuration, and computers, and therefore do not reflect the performance of the Company network only.

Your Internet Service Speeds: Company provides residential and commercial customers with a variety of high speed internet plans from which to choose from. However Company does not guarantee that a customer will actually achieve those speeds at all times. Without purchasing an expensive, dedicated Internet connection, no Internet Service Provider (ISP) can guarantee a particular speed at all times to a customer. Company advertises its speeds "up to" a specific level based on the tier of service to which a customer subscribes. The actual speed that a customer will experience while using the Internet depends upon a variety of conditions, many of which are beyond the control of an ISP such as Company. These conditions include:

1. **Performance of a customer's computer**, including its age, processing ability, its operating system, the number of applications running at the same time, and the presence of any adware and viruses.
2. **Type of connection between a customer's computer and router.** For example, wireless connections may be slower than direct connections. Wireless connections also may be subject to greater fluctuations, interference, and congestion.
3. **The distance packets travel (round trip time of packets)** between a customer's computer and its final destination on the internet., including the same number and quality of the networks of various operators in the transmission path. The internet is a "network of networks" A customer's connection may traverse the networks of multiple providers before reaching its destination, the limitations of those networks will most likely affect the overall speed of the Internet connection.
4. **Congestion or high levels at the website or destination.** If a large number of visitors are accessing a particular destination at the same time, your connection will be affected if the site or destination does not have sufficient capacity to service all the visitors efficiently.
5. **Gating of speeds or access by the website or destination.** In order to control traffic or performance, many websites limit the speeds at which a visitor can download from their site. Those limitations will carry through to a customer's connection,
6. **The performance of the router you have installed.** Router performance may degrade over time, and certain routers are not capable of handling higher speeds.

This is the reason that Company, like all other ISP's, advertise speeds "up to" a particular level, and does not guarantee them.

There are other speed tests that measure Internet performance. We provided links to a few of these sites below for your reference. Please note, however that all speed tests have biases and flaws. Each of these test's measures limited aspects of an ISP's speed and therefore must be seen as a guide rather than definitive measurements of performance.

<http://www.speedtest.net>

www.palotelephone.com Internet Speed Test

Latency: Latency is another measurement of internet performance. Latency is the time delay in transmitting or receiving packets on a network. Latency is primarily a function of the distance between two points of transmission, but also can be affected by the quality of the network or networks used in transmission. Latency is typically measured in milliseconds, and generally has no significant impact on typical everyday Internet usage. As latency varies based on any number of factors, most importantly the distance between a customer's computer and the ultimate Internet destination (as well as the number and variety of networks your packets cross). It is not possible to provide customers with a single figure that will define latency as part of a user experience.

Congestion Management: Company does not implement any congestion management techniques. Company operates our network to accommodate the necessary traffic requirements. In the event of congestion, all traffic is classified as best effort.

Content: Company does not discriminate any customer traffic. Company utilizes the network management techniques that are equal and standard across all user applications. We do not modify our network to make our directly served applications perform better than applications a user would access over the general internet. For example, Company does not manipulate our network to perform better for customers accessing Company email servers versus Company customers accessing Google's Gmail. The network management practices employed by the Company do not differ between our directly offered applications to those general application offered over the internet.

Security Measures: In the event of a Denial of Service attack (DoS), Distributed Denial of Service (DDoS) attack, spoofing or other malicious traffic, Company will implement inbound and outbound filtering on specific hosts. These actions will be performed to ensure reliability and availability of the Company Network. These actions will not be utilized for normal Internet applications and traffic.

Note: INS may perform this action on behalf of Company equipment that is managed by INS

Privacy Policy: Company has provided the privacy statement in order to demonstrate our firm commitment to your privacy. The following policy discloses our information gathering and dissemination practices for Company.

Information: Company is the sole owner of the information collected on its website

Viewer Privacy: Company does not collect personal information such as names, e-mail address, postal address, or telephone numbers. Since we do not collect any personal information on this website, we do not share any personal information with any third parties nor do we use any personal information for any purposes.

IP Addresses: As noted above, we do not collect any person information on this website. We do however, collect and store information about your internet connection when you visit our website to read or download information, such as reports, news, etc. We use this information to track Website use, measure site traffic, and improve site navigation and information. We collect information that identifies:

1. The name of the domain you access the Internet with
2. The type of web browsing software you use to view our site
3. The date and time of your access
4. The platform you are using (Windows, MAC, Unix)

This information is never sold, given or disclosed to third parties. This information is used internally to administer our web site, provide better services to the public, and provide aggregate traffic statistics to Company staff. No personal information is collected!

Hyperlinks: Additionally, this site contains links to other sites. Company is not responsible for the privacy practices or the content of such Web sites, unless operated directly by the Company. We encourage you to note when you leave our website and read privacy statements of each website that collects personally identifiable information.

Acceptance and Jurisdiction: By using this service you agree that you have read, understand, and will abide, and be bound by the terms of this Website Privacy and Policies (terms). If you do not agree to these terms, Please do not use the Company Website. These terms shall be governed in all respects in accordance with the laws of the State of Iowa without regard to the conflict or choice of law rules thereof. Courts sitting in the state of Iowa, federal and state, shall have exclusive jurisdiction over any dispute arising hereunder.

Palo Cooperative Telephone Association reserves the right to change, modify, or update this statement at any time without notice.

Contacting Company: If you have any questions about this privacy statement, the practices of this site, or your dealings with Palo Cooperative Telephone Association, you may contact us at the following:

Palo Cooperative Telephone Association

PO Box 169

Palo, IA 52324