

## **Open Internet Transparency Policy**

### **Townes Telecommunications and Subsidiaries**

The Townes Telecommunications Companies (Choctaw Telephone Company, Electra Telephone Company, Haxtun Telephone Company, MoKan Dial, Inc. Kansas and Missouri, Northeast Florida Telephone Company, Oregon Farmers Mutual Telephone Company, Pymatuning Independent Telephone Company, Tatum Telephone Company, and Walnut Hill Telephone Company) provide broadband Internet access service (BIAS) in compliance with the Federal Communications Commission transparency rules contained in the Code of Federal Regulations Title 47, Part 8. The following sets forth the Townes Telecommunications Companies' information regarding their network management practices, performance, and commercial terms of broadband Internet access services. This information is provided to assist consumers in making informed choices regarding selection of internet offerings.

#### **Network Management Practices**

The Townes Telecommunications Companies do not block, throttle, permit or engage in paid prioritization, or engage in interference with an internet end-user's ability to access lawful content.

**No Blocking:** Townes Telecommunications Companies do not block lawful content, applications, services, or non-harmful devices subject to reasonable network management.

**No Throttling:** Townes Telecommunications Companies do not throttle, impair or degrade lawful Internet traffic on the basis of Internet content, application, or service, or use of a non-harmful device, subject to reasonable network management.

**No Paid Prioritization:** Townes Telecommunications Companies do not directly or indirectly favor any type of Internet traffic over other traffic. This non-prioritization of traffic applies to all prioritization methods, including but not limited to, traffic shaping, prioritization, and resource reservation.

**No Unreasonable Interference:** Townes Telecommunications Companies do not unreasonably interfere with or unreasonably disadvantage end users' ability to select, access, and use BIAS or the lawful Internet content, applications, services, or devices of their choice, or edge providers' ability to make lawful content, applications, services, or devices available to end users, subject to reasonable network management.

#### **Network Performance Characteristics**

The Townes Telecommunications Companies do measure usage as a means of maintaining network integrity and providing reasonable network management. The measurement of usage is not at a granular level, meaning specific traffic to websites or content is not measured only the amount of traffic passing through network technical components and backhaul as a means of ensuring equipment is operating at the required capacity. Measured usage service as a tool for congestion management, as traffic levels increase backhaul and equipment needs are adjusted accordingly. This process eliminates the need for usage limits.

**Device Attachment Rules:** Townes Telecommunications Companies do require end users to lease our modem for connectivity to BIAS. End users can connect other devices to the modem

however they do so at their own risk. No device which would permit end-users to resell BIAS service, or to conduct illegal activities is permitted.

Security: Townes Telecommunications Companies have measures in place to secure the network and equipment used to provide BIAS. Any user conducting an attack, hacking into, or creating programs to infiltrate the Townes Telecommunications Companies BIAS network will have their end-user service terminated, at minimum.

**Performance Characteristics**

BIAS is delivered via ADSL, SDSL, VDSL, Fixed Wireless, and Fiber technologies. The DSL and Fixed Wireless methods are mileage sensitive products and are provided at a best efforts level. Product speeds sold to end-user customers are sold in ranges with a maximum attainable speed for that product tier identified. Actual speed for the DSL and Fixed Wireless products are dependent upon the customer’s location and distance from the facilities. All end users are advised as to what their maximum attainable speed for their location is when product is installed and technician runs a speed test. BIAS products at 10Mbps or higher are suitable for the service or real-time applications such as streaming content without jitter or interruption.

**Commercial Terms of Broadband Internet Access Service**

The Townes Telecommunications Companies provide the commercial terms of BIAS, including but not limited to monthly prices and early termination and additional network services, with the contract the end user signs upon initiating service in addition to posting these terms on each individual company website. Redress options as practice for complaints or problems with end user usage are identified in the Acceptable Usage Policy posted on each company website. The commercial contract, pricing, and acceptable usage policies can be found at:

Townes Telecommunications Companies	Pricing and Terms web-link	Acceptable Usage Policy
Choctaw Telephone Company	<a href="http://www.mokandial.net/choctaw/high_speed_internet/">http://www.mokandial.net/choctaw/high_speed_internet/</a>	<a href="http://www.mokandial.net/usage_policy/">http://www.mokandial.net/usage_policy/</a>
Electra Telephone Company	<a href="http://electratel.net/residential/res_internet/">http://electratel.net/residential/res_internet/</a>	<a href="http://electratel.net/usage_policy/">http://electratel.net/usage_policy/</a>
Haxtun Telephone Company	<a href="http://haxtuntel.net/res_internet/">http://haxtuntel.net/res_internet/</a>	<a href="http://haxtuntel.net/usage_policy/">http://haxtuntel.net/usage_policy/</a>
MoKan Dial, Inc	<a href="http://www.mokandial.net/internet/">http://www.mokandial.net/internet/</a>	<a href="http://www.mokandial.net/usage_policy/">http://www.mokandial.net/usage_policy/</a>
Northeast Florida Telephone Company	<a href="http://nefcom.net/residential/res_internet/">http://nefcom.net/residential/res_internet/</a>	<a href="http://nefcom.net/usage_policy/">http://nefcom.net/usage_policy/</a>

Oregon Farmers Mutual Telephone Company	<a href="http://ofmlive.net/internet_services_OFM.html">http://ofmlive.net/internet services OFM.html</a> and <a href="http://ofmlive.net/bundles_OFM.html">http://ofmlive.net/bundles OFM.html</a>	
Pymatuning Independent Telephone Company	<a href="http://pymtele.net/res_internet/">http://pymtele.net/res_internet/</a>	<a href="http://pymtele.net/usage_policy/">http://pymtele.net/usage_policy/</a>
Tatum Telephone Company	<a href="http://tatumtel.net/internet/">http://tatumtel.net/internet/</a>	<a href="http://tatumtel.net/usage_policy/">http://tatumtel.net/usage_policy/</a>
Walnut Hill Telephone Company	<a href="http://www.walnuthilltel.com/residential/res_internet/">http://www.walnuthilltel.com/residential/res_internet/</a>	<a href="http://www.walnuthilltel.com/usage_policy/">http://www.walnuthilltel.com/usage_policy/</a>

**Privacy policy**

The Townes Telecommunications Companies do not store end user traffic detail, nor is any end user data provided or sold to third parties. End user usage data will be provided by the Townes Telecommunications Companies to law enforcement in compliance or response to a subpoena.