

Open Internet Transparency Disclosure For Wireline and Fixed Wireless Network Services

The following policies apply to mass market broadband Internet services offered by Viola Home Telephone Company (“Viola”).

It is Viola’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, Viola 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.

Viola 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 Viola’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.

Viola Terms of Service are provided within applications for its internet services at <https://www.violatel.com/applications/>.

I. INTERNET ACCEPTABLE USE POLICY (“AUP”)

Viola’s Acceptable Use Policies are provided within applications for its internet services at <https://www.violatel.com/applications/>.

II. NETWORK MANAGEMENT; RELATED DEVICE AND PRIVACY POLICIES

Device Attachment Rules. With respect to Viola’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, which includes the AUP. Viola 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. Viola collects personally identifiable information in order to provide fixed broadband service, and to bill for this service. Viola does not collect any information concerning the customer's visited websites, application usage or other Internet activity, in the normal course of business. Additional information on our privacy policy are included in our service applications and included AUP.

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 that may be required by federal or state law. The Company would, for instance, retain, store and provide 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 in order to sell additional services to them.

III. COMMERCIAL TERMS

Pricing. Please see <https://www.violatel.com/viola-internet/> and <https://www.violatel.com/wireless-internet/> for plans and pricing. These 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 Viola business office at 309-596-2222 or info@violatel.com. ("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. Viola's disclosure includes information required by paragraphs 218-223 of the [Restoring Internet Freedom Order](#).

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

Throttling. Viola 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. Viola 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. Viola 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. Viola 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, Viola 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.

Viola employs a protocol agnostic congestion management policy that does not discriminate against particular applications. Users remain free to access the websites of their choice and run the applications of their choice consistent with the Acceptable Usage Policy "AUP". Viola deploys quality of service and network management servers and software that constantly monitors aggregate network traffic levels. If a particular customer or group of customers is determined to be the source of high volume of network traffic, the traffic from that customer or group may be temporarily assigned a lower priority status. It should be noted that when a user's traffic is assigned a lower priority status, their data packets will not be delayed or dropped as long the aggregate traffic on their segment does not exceed provisioned capacity for the segment as a whole. However, in cases where demand exceeds capacity, it is possible that the data traffic of any user could be delayed.

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 Viola's mass market services are sufficient to support such applications as Voice over IP (VoIP), gaming, web surfing, or most streaming video. However, because Viola'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.

Security. We employ remote administration address filtering & Network address translation on most Viola-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.

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

Broadband Service is provided using multiple access mediums.

- On ADSL2+/copper 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, except where extremely great distance over copper facilities make this

impossible until those facilities are scheduled for upgrade or replacement. Prospective customers will be informed of these situations at the time services are ordered.

- On Fixed Wireless broadband connections, observed speeds are dependent on packages taken by customer. Latencies of 100ms or less can be expected and achieved speeds at more than 80% of advertised speed, or speed that may be possible, given difficult geography or great distance from our towers and equipment. Prospective customers will be informed of these situations and difficulties at the time services are ordered.
- 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.

Internet speeds within the Viola network may be measured by performing speed tests at the URL: www.speedtest.net/ .

Actual access speed, as well as latency, are impacted by the length, capacity and congestion of Middle Mile transport facilities (between the Company's service area and Internet nodes) in addition to characteristic of the Company's own network. Because conditions on these facilities and routes can change frequently, the Company can provide estimated actual access speed and latency information only for specific recent time periods requested by a customer.

The Company's service is suitable for real-time applications, including VoIP. The speed tier a customer subscribes to will impact the efficiency of the real-time applications.

While Viola 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, Viola 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. Viola 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 Viola 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 Viola'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. Viola may offer an Internet Protocol-voice based service or Hosted PBX service to customers with Viola 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 VoIP traffic should have no material impact on capacity or bandwidth availability for Broadband Internet Access.

Customers purchasing a Hosted PBX or similar VoIP service may experience a higher quality of service through improved latency for upstream voice packets carried over the Internet network. This higher quality of service is enabled through Type of Service and Differentiated Service capabilities at the customer modem and in limited network equipment deployed across the Viola high-speed Internet network. The setting established at the modem or router may be modified by our customers, which may impact actual speed and/or latency.

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