

# GBT Network Management Policy

## Golden Belt Telephone Assn., Inc.

### Network Management Practices Policy Disclosure

Pursuant to the Federal Communications Commission's newly enacted Open Internet Rules found in Part 8 of Title 47 of the Code of Federal Regulations, Golden Belt Telephone Assn., Inc.'s ("Provider") policies regarding network management practices, performance characteristics, and commercial terms are provided in entirety so that Provider's current customers, prospective customers, third-party content providers and other interested parties can make informed choices regarding the broadband Internet access services offered by Provider, and the extent Provider's network management practices may affect those services.

#### Network Management Practices

In the interest of providing the best online experience possible for all of Provider's customers, Provider utilizes reasonable network management practices tailored to achieve legitimate network management purposes. Because bandwidth is a limited resource for broadband Internet service providers, it is essential that Provider reasonably manages its network to promote the use and enjoyment of the Internet by all of Provider's customers. By engaging in reasonable and responsible network management, Provider prevents its customers from being subjected to the negative effects of spam, viruses, security attacks, network congestion, and other risks that threaten to degrade service. The network management practices employed by Provider are consistent with industry standards.

#### Congestion Management

It is possible that a relatively small number of customers may place a disproportionate demand on the network bandwidth resources, causing network congestion and an overall degradation in service quality for other end users. For this reason, if Provider's network nears a state of congestion, Provider will use congestion management practices to ensure all of Provider's customers retain access to a "fair share" of bandwidth resources.

When Provider's network nears a state of congestion, the congestion management tools, practices and/or software employed by Provider will identify segments of the Provider network which have a predetermined, aggregated level of bandwidth usage. From there, the congestion management tools will ascertain which customer account in the identified network segment is using a disproportionate share of the bandwidth. The Internet traffic of the identified customer account may be temporarily managed until the period of network congestion passes. Customers whose Internet traffic is temporarily managed by Provider will still be able to do anything they want online, and many activities will be unaffected; however, these customers may experience slower downloads and uploads and Internet/website response times.

The congestion management practices utilized by Provider are "protocol-agnostic" meaning that the network does not manage congestion based on the online activities, protocols or applications a customer uses. Rather, Provider's congestion management practices focus only on the heaviest bandwidth users in real time.

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## Application-Specific Behavior

Provider does not make use of any application-specific network management practices. Provider does not favor, modify, inhibit, rate control or block any specific protocols, protocol ports or fields, or any applications or classes of applications.

## Device Attachment Rules

In order for a device to be approved for use on the Provider's network, the device must conform to publicly available industry standards and be non-harmful to Provider's network.

## Security

Provider offers its customers unrestricted access to all of the lawful content, services, and applications available on the Internet. Provider uses industry standard tools and generally accepted best practices and policies to protect our customers from spam, phishing, and other unwanted or harmful online content and activities. In the instances where these tools and policies identify online content as harmful or unwanted, the content may be prevented from reaching customers, or customers may be permitted to identify or inspect content to determine if it is harmful or unwanted.

Provider currently utilizes a custom built application for spam and virus filtering.

## Performance Characteristics

Provider offers broadband Internet access service via Fiber to the Home ("FTTH"), Digital Subscriber Line ("DSL"), Cable TV Modem, and fixed Wireless.

The advertised speed of Provider's Internet service is the maximum speed available to consumers and may or may not be the maximum speed achievable with the technology utilized. 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 Provider. These conditions include:

1. Performance of a customer's computer, including its age, processing capability, its operating system, the number of applications running simultaneously, and the presence of any adware and viruses
2. Type of connection between a customer's computer and modem. For example, wireless connections may be slower than direct connections into a router or modem. Wireless connections also may be subject to greater fluctuations, interference and congestion. Provider does not recommend wireless modem connections for use with its higher speed tiers as many wireless connections do not perform at the speeds delivered by these tiers.
3. The distance packets travel (round trip time of packets) between a customer's computer and its final destination on the Internet, including the number and quality of the

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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, and the limitations of those networks will most likely affect the overall speed of that Internet connection.

4. Congestion or high usage levels at the website or destination. If a large number of visitors are accessing a site or particular destination at the same time, your connection will be affected if the site or destination does not have sufficient capacity to serve all of 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.

This is the reason that Provider, like all other ISPs, advertises speeds as "up to" a particular level, and does not guarantee them.

### Speed Tests

Provider offers its customers the ability to test the speeds that they are receiving on Provider's network. Listed below are a few speed tests that measure Internet performance. We have 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 tests 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>

<http://speedtest.nex-tech.com/>

<http://netalyzr.icsi.berkeley.edu>

<http://www.broadband.gov/qualitytest/about/>

The following are advertised Internet Service Levels offered by Provider, the mean upload and download speeds as tested during peak usage periods (*i.e.*, between 7:00 p.m. and 11:00 p.m. on weeknights), and a mean round trip latency determined by pinging one of the major web search engine's servers. Internet speed tests

The listed Internet Service Levels and delivery technology published below are representative offerings of Provider and may not include all service levels. All of Provider's service offerings may not be available at all locations. To see Provider's current service offerings on broadband Internet access service, please visit our website [www.gbta.net](http://www.gbta.net), or call 1-800-432-7965 to speak with a customer service representative.

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Provider provisions its customers' modems and engineers its network to ensure that its customers can enjoy the speeds to which they subscribe. However, Provider 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. Provider advertises its speeds as "up to" a specific level based on the tier of service to which a customer subscribes.

FTTH	Mean	
3Mbps Down\512Kbps Up	3.15 x .502Mbps	47ms
6Mbps Down\1Mbps Up	6.13 x 1.14Mbps	49ms
10Mbps Down\2Mbps Up	10.26 x 2.02Mbps	57ms
20Mbps Down\3Mbps Up	19.43 x 3.10Mbps	53ms
50Mbps Down\3Mbps Up	51.55 x 3.08Mbps	58ms
DSL	Mean	
3Mbps Down\512Kbps Up	2.79 x .487Mbps	47ms
6Mbps Down\1Mbps Up	5.82 x .932Mbps	49ms
10Mbps Down\1Mbps Up	9.26 x .954Mbps	57ms
Cable Modem	Mean	
1.5Mbps Down\512Kbps Up	1.48 x .49Mbps	53ms
3Mbps Down\1Mbps Up	3.08 x 1.03Mbps	47ms
6Mbps Down\1Mbps Up	6.03 x .98Mbps	49ms
Wireless	Mean	
768Kbps Down\256Kbps Up	742 x 241Kbps	87ms
1.5Mbps Down\768Kbps Up	1487 x 752Kbps	84ms

The actual speeds achieved with Provider's Internet service offering make Provider's Internet service suitable for real-time applications, such as Voice over Internet Protocol ("VoIP").

### Pricing

In order to meet the usage and budgetary needs of all of our customers, Provider offers a wide selection of broadband Internet access plan options, including promotional offerings, bundled service choices, and ala carte alternatives.

To see Provider's current promotions and pricing on broadband Internet access service, please visit our website [www.gbta.net](http://www.gbta.net), or call 1-800-432-7965 to speak with a customer service representative.

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## Early Termination Fees

If a customer previously entered into a service agreement with Provider for broadband Internet access service for a defined service term, and customer desires to terminate the service agreement prior to the expiration of that term, Provider may charge a reasonable early termination fee if such fee is clearly indicated in the service agreement.

## Usage-Based Fees

Provider's Internet service is priced on a flat-fee basis (plus taxes). Provider does not charge end users a usage-based fee for Internet service. For additional information on Provider's fee schedule for additional network services, visit the Provider's website at: [www.gbta.net](http://www.gbta.net)

## Privacy Policy

The various network management tools and techniques utilized by Provider do not monitor, inspect or store the network activity and traffic of its Internet service users. Further, as part of its network management practices, Provider does not distribute information on network activity and/or traffic to any third party, or use network traffic information for any non-network management purpose.

Provider affords full access to all lawful content, services and applications available on the Internet and does not routinely monitor, inspect or store the network activity and traffic of its Internet service users. However, Provider reserves the right to monitor bandwidth, usage, transmissions and content for purposes of protecting the integrity of the network and Provider's Internet access service through reasonable network management practices.

Provider may collect equipment information to identify the equipment customer is using on the network, including, but not limited to: equipment type, serial number, settings, configuration and software. Provider may also collect performance information to examine the operation of the equipment, services and applications the customer may use on the network, including, but not limited to: IP addresses, URLs, data transmission rates and latencies, location information, security characteristics, and information about the amount of bandwidth and other network resources customer is using in connections with uploading, downloading or streaming data to and from the Internet.

Network traffic, activity, performance information, and equipment information monitored or collected by Provider is done so for the sole purpose of reasonable network management purposes.

Provider is required to comply with relevant laws, regulations and judicial orders. Information covered under this Privacy Policy, as well as other categories of information, may be disclosed to third parties if Provider determines, in its sole discretion, that such a disclosure is necessary or required. Provider may also disclose this information if, in its sole discretion, such a disclosure is

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necessary or required to protect our interests or the interests of our customers. Provider may also disclose this information in connection with the sale of our business.

The Provider's network management practices as discussed herein are intended solely to provide the best online experience possible for all of Provider's customers by safeguarding our network and its users from spam, viruses, phishing, and other unwanted or harmful online content and activities. Provider's network management practices are not intended, nor implemented, to block consumers from accessing the content and applications of their choice, deprive consumers of their entitlement to competition, or discriminate against or in favor of certain network traffic. End users with questions, concerns or complaints regarding Provider's network management practices are encouraged to contact Provider for issue resolution.

### Contact Us

If you have any questions regarding Provider's Network Management Practices Policy or would like to file a complaint with Provider regarding its network management practices, please contact Provider at:

Golden Belt Telephone Assn., Inc.  
Attn: Internet Solutions  
PO Box 229  
Rush Center, KS 67575  
785-372-4236  
[nluea@gbtlive.com](mailto:nluea@gbtlive.com)

Further, if you believe that Provider is in violation of the FCC's Open Internet Rules, you may file either an informal or formal complaint with the FCC.

<http://esupport.fcc.gov/complaints.htm>

### Additional Disclaimers

The Open Internet Rules, as adopted, and Provider's Network Management Practices Policy are not intended to affect, alter or otherwise supersede the legal status of cooperative efforts by broadband Internet access service providers and other service providers that are designed to curtail infringement in response to information provided by rights holders in a manner that is timely, effective, and accommodates the legitimate interests of providers, rights holders, and end users.

Furthermore, the Open Internet Rules, as adopted, and Provider's Network Management Practices Policy do not prohibit Provider from making reasonable efforts to address the transfer of unlawful content or unlawful transfers of content.