

Griswold Cooperative Telephone Company Network Management Practices Policy

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, the policies of Griswold Cooperative Telephone Company ("Provider") 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

Provider does not employ any congestion management tools, practices and/or software on network traffic.

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.

Further, Provider does not discriminate or prioritize any network traffic. Any network management techniques utilized on Provider's network are applied equally and standard across all user applications. Provider's network is not modified to allow certain applications to perform better than any application accessed over the public Internet.

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.

Additionally, the functionality of Provider's broadband Internet access service may be subject to the following minimum computer requirements:

Microsoft Windows 2000 or higher; Macintosh OS X or higher

- DSL will work with Windows 95, Windows 98 or Windows ME; however, Microsoft no longer supports these Operating Systems.
- Macintosh OS X (pronounced OS Ten) is the only Operating System supported by Apple. Older versions of the Macintosh software will work, but contain old versions of Microsoft Internet Explorer and Microsoft Outlook Express that are no longer supported.

PC Processors

- Pentium II 233 MHz or higher and AMD Duron or higher.

One available Ethernet or USB port is required

- Ethernet connection with 64MB RAM or higher is recommended.
- USB connection requires a minimum of 128MB RAM. USB Drivers are included, but will only work with Windows 98 SE or newer Windows Operating Systems, and require a CD-ROM Drive to install.
- Macintosh computers must use an Ethernet connection. USB Drivers will not work.

One Network Interface Card (“NIC”) must be available

- 20MB of free hard-drive space is recommended.
- Computers with less free space could have issues with e-mail, picture movement, loading of updates and other software programs.

All Windows updates should be completed

- Anti-virus and spy-ware protection on PC machines are highly recommended.

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.

In the event of Denial of Service (“DoS”) or Distributed Denial of Service (“DDoS”) attack, spoofing or other malicious traffic, Provider will implement inbound and outbound filtering on specific hosts. These actions will be performed to ensure reliability and availability of Provider’s network. These actions will not be utilized for normal Internet applications and traffic.

To ensure added security protection for network users, Provider has Spam Control available free of charge to all Internet service customers and Tech Home services available for a minimal monthly fee.

Spam Control and Virus Filtering allows users to control the emails delivered to their email inbox by allowing users to adjust settings to personalize the level of protection desired, safely view messages

from the password-protected message center at any time and to delete the message prior to its delivery into user's email inbox.

The Tech Home services available from Provider include automated spyware protection, automated virus protection, automated Windows updates, parental controls, disk optimization, pop-up blockers and monthly reports.

The security measures employed by Provider to prevent the spread of viruses, malware, spam, harmful and unwanted content or other threats to consumers do not prevent end-users from running certain applications.

Performance Characteristics

Provider offers broadband Internet access service via Fiber-to-the-Home ("FTTH"). FTTH utilizes fiber optic cable to deliver telephone, data and video services. With the capacity for an indefinite amount of data, FTTH technology allows subscribers to receive better quality voice, data and video services in their homes.

The advertised speed of Provider's Internet service is the maximum speed achievable with the technology utilized by Provider. While the maximum advertised speed is attainable for end users, several factors may affect the actual speed of Provider's Internet service offerings, including, but not limited to: the distance of the consumer's home or office from Provider's central office (i.e., the further away the customer is from the central office, the slower the broadband speed), the end user's computer, modem or router, activity during peak usage periods, and other factors outside of Provider's control.

Based on internal testing using a consumer accessible speed test available at <http://netins.net/speed.htm>, the mean upload and download speeds are typically the advertised speeds, plus or minus 10% during peak usage periods (i.e., between 7:00 p.m. and 11:00 p.m. on weeknights).

Latency on Provider's network falls within industry standards.

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").

Provider does not offer any specialized services.

Commercial Terms

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.

Provider's current broadband Internet access service packages are available at:
griswoldcommunications.com

Monthly rate pricing does not include charges for equipment cost.

Subscription to Provider's broadband Internet access service may require a one agreement. An additional monthly fee (including professional installation, if applicable) will apply to wireless routers and wi-fi extenders.

For additional information on Provider's current packages and pricing, call 712-778-2121 to speak with a customer service representative.

Early Termination Fees

If a customer has 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.

Early termination results in customer being responsible for payment of the \$90 installation fee.

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: griswoldcommunications.com

Privacy Policy

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. To ensure optimal network performance, 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.

For troubleshooting purposes, 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 all relevant laws, regulations and governmental requests.

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:

Griswold Communications
607 Main St.
PO Box 640
Griswold, IA 51535
Phone: 712-778-2121
Email: gctc@netins.net
griswoldcommunications.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.

For additional information, please review Provider's Internet Acceptable Use Policy at:
griswoldcommunications.com