

FLATROCK TELEPHONE CO-OP, INC.  
NETWORK TRANSPARENCY STATEMENT

FlatRock Telephone Co-op, Inc. ("FlatRock" or "Company") provides this Network Transparency Statement in accordance with the FCC's Restore Internet Freedom Rules to ensure that you have sufficient information to make informed choices about the purchase of broadband services. Information about FlatRock's other policies and practices concerning broadband are available at [www.frtci.net](http://www.frtci.net) ("FlatRock Website").

FlatRock engages in network management practices that are tailored and appropriate for achieving optimization on the network considering the particular network architecture and technology of its broadband Internet access service. FlatRock's goal is to ensure that all of its customers experience a safe and secure broadband Internet environment that is fast, reliable and affordable. FlatRock wants its customers to indulge in all that the Internet has to offer, whether it is social networking, streaming videos and music, to communicating through email and videoconferencing.

FlatRock's network management includes congestion- and security-protocol-management and customers generally will not be impacted by the protocols and practices that FlatRock uses to manage its network.

**A. FlatRock's Network Transparency Disclosures**

FlatRock uses various tools and industry standard techniques to manage its network and deliver fast, secure and reliable Internet service. FlatRock believes in full transparency and provides the following disclosures about its network management practices:

1. **Blocking:** FlatRock does not block or discriminate against lawful content.
2. **Throttling:** FlatRock does not throttle, impair or degrade lawful Internet traffic.
3. **Affiliated Prioritization:** FlatRock does not prioritize Internet traffic and has no plans to do so.
4. **Paid Prioritization:** FlatRock has never engaged in paid prioritization. We don't prioritize Internet for consideration to benefit particular content, applications, services or devices. FlatRock does not have plans to enter into paid prioritization deals to create fast lanes.
5. **Congestion Management:** FlatRock monitors the connections on its network in the aggregate on a continuous basis to determine the rate of utilization. If congestion

emerges on the network, FlatRock will take the appropriate measures to relieve congestion.

On FlatRock's network, all customers have access to all legal services, applications and content online and, in the event of congestion, most Internet activities will be unaffected. Some customers, however, may experience longer download or upload times, or slower surf speeds on the web if instances of congestion do occur on FlatRock's network.

Customers using conduct that abuses or threatens the FlatRock network or which violates the company's Acceptable Use Policy, Internet service Terms and Conditions, or the Internet Service Agreement will be asked to stop any such use immediately. A failure to respond or to cease any such conduct could result in service suspension or termination.

FlatRock's network and congestion management practices are 'application-agnostic', based on current network conditions, and are not implemented on the basis of customers' online activities, protocols or applications. FlatRock's network management practices do not relate to any particular customer's aggregate monthly data usage.

FlatRock monitors its network on a continuous basis to determine utilization on its network. FlatRock also checks for abnormal traffic flows, network security breaches, malware, loss, and damage to the network. If a breach is detected or high volume users are brought to light by complaint, FlatRock provides notification to the customer via email or phone. If a violation of FlatRock's policies has occurred and such violation is not remedied, FlatRock will seek to suspend or terminate that customer's service.

6. **Application-Specific Behavior:** Except as may be provided elsewhere herein, FlatRock does not currently engage in any application-specific behaviors on its network. Customers may use any lawful applications with FlatRock.
7. **Device Attachment Rules:** For best results, DSL modems, wireless modems, or other proprietary network gateways used on the FlatRock broadband network should be provided by FlatRock. Customers may attach devices of their choosing to their modems, including wired or wireless routers, laptops, desktop computers, video game systems, televisions, or other network-enabled electronics equipment. However, customers are responsible for ensuring that their equipment does not harm FlatRock's network or impair the service of other customers. FlatRock is not responsible for the functionality or compatibility of any equipment provided by its customers. Customers are responsible for securing their own equipment to prevent unauthorized access to FlatRock's broadband network by third parties and will be

held responsible for the actions of such third parties who gain unauthorized access through unsecured customer equipment.

- 8. Network Security:** FlatRock knows the importance of securing its network and customers from network threats and annoyances. The company promotes the security of its network and patrons by protections from such threats as spam, viruses, firewall issues, and phishing schemes. FlatRock also deploys spam filters in order to divert spam from an online customer's email inbox into a quarantine file while allowing the customer to control which emails are identified as spam. Customers may access the spam files through the email. Spam files are automatically deleted if not accessed within 30 days.

As its normal practice, FlatRock does not block any protocols, content or traffic for purposes of network management, but FlatRock may block or limit such traffic as spam, viruses, malware, or denial of service attacks to protect network integrity and the security of our customers.

## **B. Network Performance**

### **1. Service Descriptions**

FlatRock deploys Internet access to its subscribers through hardwired broadband copper DSL facilities.

### **2. Network Performance**

FlatRock makes every effort to support advertised speeds and will dispatch repair technicians to customer sites to perform speed tests as needed to troubleshoot and resolve speed and application performance caused by FlatRock' network. FlatRock measures availability, latency, and aggregate utilization on the network and strives to meet internal service level targets.

However, the bandwidth speed at which a particular distant website or other Internet resources may be downloaded, or the speed at which your customer information may be uploaded to a distant website or Internet location is affected by factors beyond FlatRock' control, including the speed of the connection from a distant web server to the Internet, congestion on intermediate networks, and/or limitations on your own computer equipment, including a wireless router. In addition, your service performance may be affected by the inside wiring at your premise. Accordingly, you, the customer, must consider the capabilities of your own equipment when choosing a FlatRock broadband service. Your computers and/or wireless or other networks in your homes or offices may need an upgrade in order to take full advantage of the chosen FlatRock broadband plan.

For the wireless service, FlatRock measures Bit Error Rate (BER) and the Received Signal Strength Indicator (RSSI) parameters for transmission rates, latency, and traffic every 15 min. For DSL, Fiber and T1 service, FlatRock measures traffic every 5 min. All services are best effort.

FlatRock tests each service for actual and expected access speeds at the time of network installation to demonstrate that the service is capable of supporting the advertised speed. Customers may request assistance by calling our business office at 618.584.3211 or by email at [ron@frtci.net](mailto:ron@frtci.net).

Based on the network information FlatRock receives from its monitoring efforts, FlatRock' network is delivering data transmission rates advertised for the different high-speed Internet services. To be sure, FlatRock has implemented a program of testing the performance of its network by using a test protocol similar to the one sanctioned by the FCC. We installed specific network performance monitoring equipment at aggregation points across our network and conducted a series of tests using this equipment. FlatRock reports the results of this testing below. This result applies to both upload and download data rates, and applies for measurements made both at peak times and over a 24-hour period:

**DOWNLOAD & UPLOAD SPEEDS**

<b>ADVERTISED</b>	<b>ACTUAL SUSTAINED</b>	<b>PERCENTAGE DIFFERENTIAL</b>
<b>Download</b>		
<b>1 Mbps</b>	<b>1 kbps</b>	<b>0%</b>
<b>3 Mbps</b>	<b>3 Mbps</b>	<b>0%</b>
<b>6 Mbps</b>	<b>6 Mbps</b>	<b>0%</b>
<b>10 Mbps</b>	<b>10 Mbps</b>	<b>0%</b>
<b>20 Mbps</b>	<b>20 Mbps</b>	<b>0%</b>
<b>Upload</b>		
<b>256 Kbps</b>	<b>256 Kbps</b>	<b>0%</b>
<b>512 Kbps</b>	<b>512 Kbps</b>	<b>0%</b>
<b>768 Kbps</b>	<b>768 Kbps</b>	<b>0%</b>
<b>1 Mbps</b>	<b>1 Mbps</b>	<b>0%</b>
<b>2 Mbps</b>	<b>2 Mbps</b>	<b>0%</b>

**3. Impact of Non-BIAS Data Services**

The FCC has defined Non-Broadband Internet Access Services (Non-BIAS) to include services offered by broadband providers that share capacity with Broadband Internet Access Services

(BIAS) (previously known as “Specialized Services”) also offered by the provider over the last-mile facilities. At this time, FlatRock is not offering any non-BIAS data services.

### C. Commercial Terms

Pricing and additional service information may be found [here](#).

In addition to this Network Transparency Statement, patrons may also find links to the following on the FlatRock Website:

- [Privacy Policy](#)
- [Frequently Asked Questions \(“FAQs”\)](#)
- [Acceptable Use Policy](#)

For questions, complaints or requests for additional information, please contact FlatRock at:

Business Office at (618) 584-3211

Email at [Ron@frtci.net](mailto:Ron@frtci.net)

**Commented [TP1]:** I do not find rates, Privacy Policy, FAQs or Acceptable Use Policy on the FlatRock website. I recommend these policies for the benefit of your customers. Please let me know if I can provide templates.