

S&A Telephone Company

Network TRANSPARENCY statement

S&A Telephone 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 **S&A Telephone Company's** other policies and practices concerning broadband are available at www.SATelephone.com.

S&A Telephone Company 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 **S&A Telephone Company's** network. **S&A Telephone Company** measures availability, latency, and aggregate utilization on the network and strives to meet internal service level targets.

S&A Telephone Company is also required by the FCC to test a random set of customers for speed and latency periodically during the year. This transparency statement discloses that **S&A Telephone Company** will perform these tests. If additional equipment is required for a selected customer for this testing, **S&A Telephone Company** will contact the customer to schedule installation of the equipment.

S&A Telephone Company 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. **S&A Telephone Company's** goal is to ensure that all of its customers experience a safe and secure broadband Internet environment that is fast, reliable and affordable. **S&A Telephone Company** 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.

S&A Telephone Company's network management includes congestion- and security-protocol-management and customers generally will not be impacted by the protocols and practices that **S&A Telephone Company** uses to manage its network.

A. **S&A Telephone Company's** Network Transparency Disclosures

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

1. **Blocking:** **S&A Telephone Company** does not block or discriminate against lawful content.
2. **Throttling:** **S&A Telephone Company** does not throttle, impair or degrade lawful Internet traffic.
3. **Affiliated Prioritization:** **S&A Telephone Company** does not prioritize Internet traffic and has no plans to do so.
4. **Paid Prioritization:** **S&A Telephone Company** has never engaged in paid prioritization. We don't prioritize Internet for consideration to benefit particular content and applications.

services or devices. **S&A Telephone Company** does not have plans to enter into paid prioritization deals to create fast lanes.

5. **Congestion Management: S&A Telephone Company** monitors the connections on its network in the aggregate on a daily basis to determine the rate of utilization. If congestion emerges on the network, **S&A Telephone Company** will take the appropriate measures to relieve congestion.

On **S&A Telephone Company'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 **S&A Telephone Company's** network.

Customers using conduct that abuses or threatens the **S&A Telephone Company** 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.

S&A Telephone Company'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. **S&A Telephone Company's** network management practices do not relate to any particular customer's aggregate monthly data usage.

S&A Telephone Company monitors its network to determine utilization on its network. **S&A Telephone Company** 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, **S&A Telephone Company** provides notification to the customer via email or phone. If a violation of **S&A Telephone Company's** policies has occurred and such violation is not remedied, **S&A Telephone Company** will seek to suspend or terminate that customer's service.

6. **Application-Specific Behavior:** Except as may be provided elsewhere herein, **S&A Telephone Company** does not currently engage in any application-specific behaviors on its network. Customers may use any lawful applications with **S&A Telephone Company**.
7. **Device Attachment Rules:** There is a limit of one public DHCP address per standard account. For best results, DSL modems, wireless modems, or other proprietary network gateways used on the **S&A Telephone Company** broadband network should be provided by **S&A Telephone Company**. 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 **S&A Telephone Company's** network or impair the service of other customers. **S&A Telephone Company** 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 **S&A Telephone Company'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:** **S&A Telephone Company** 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. **S&A Telephone Company** 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 on a timely basis.

As its normal practice, **S&A Telephone Company** does not block any protocols, content or traffic for purposes of network management, but **S&A Telephone Company** 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

S&A Telephone Company deploys Internet access to its subscribers through hardwired broadband access (DSL/ Fiber), and fixed wireless services.

2. Network Performance

S&A Telephone Company 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 **S&A Telephone Company's** network. **S&A Telephone Company** 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 **S&A Telephone Company's** 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 **S&A Telephone Company** 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 **Rye Telephone Company** broadband plan.

For the wireless service, **S&A Telephone Company** measures Bit Error Rate (BER) and the Received Signal Strength Indicator (RSSI) parameters for transmission rates, latency, and traffic. All services are best effort.

S&A Telephone Company 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 also test their actual speeds using the speed test located at <http://www.speedtest.net/> on **S&A Telephone Company's** website and may request assistance by calling our business office at 719.676.3131 or by email at rtc@ghvalley.net. Rye Telephone Company customers should select Colorado City CO for the most accurate speed test.

Based on the network information received from its monitoring efforts, **S&A Telephone Company's** network is delivering data transmission rates advertised for the different high-speed Internet services. To be sure, **S&A Telephone Company** 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. **S&A Telephone Company** 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

Download Speeds

ADVERTISED	ACTUAL SUSTAINED	PERCENTAGE DIFFERENTIAL
6 Mbps	7	1%
12 Mbps	13	1%
20 Mbps	21	1%
50 Mbps	53	3%

Upload Speeds

ADVERTISED	ACTUAL SUSTAINED	PERCENTAGE DIFFERENTIAL
6 Mbps	7	1%
12 Mbps	13	1%
20 Mbps	21	1%
50 Mbps	53	3%

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, is not offering any non-BIAS data services.

Alternative Language if Company is offering Non-BIAS services:

Real time services, such as Non-BIAS services, include Voice over Internet Protocol (VoIP) and Internet Protocol (IP) video services, command optimal bandwidth. As Non-BIAS traffic is combined with general Internet traffic on **S&A Telephone Company’s** network, broadband customers could experience service delays, although very unlikely, if there is an occurrence of congestion on **S&A Telephone Company’s** network. In any such event, the Non-BIAS traffic is given priority over general Internet traffic.

Example VoIP Non-BIAS data service Language:

S&A Telephone Company provides Voice-over-the-Internet-Protocol (VoIP) to its fixed wireless customers. The VoIP traffic uses private RFC 1918 addresses, dedicated paths for VoIP and QoS on the routers/switches it touches. The QoS priority is based on the source and destination IP. Where VoIP traffic is combined with best effort Internet traffic and QoS priority is employed, the network could endure marginal delays if there are instances of bandwidth contention, although very unlikely.

Example IP Video Non-BIAS data services Language:

The Company offers IP video service to end-users. This non-BIAS data service does not adversely affect the last-mile capacity available for the Company’s broadband Internet access services, or the performance of such services. Customer should note that significantly heavier use of non-BIAS services (particularly IP video services) may impact the available capacity for and/or the

performance of its broadband Internet access services. The Company will monitor this situation, and appreciates feedback from its customers.

C. Commercial Terms

Pricing and additional service information may be found at www.SATelephone.com

In addition to this Network Transparency Statement, patrons may also find useful links on the **S&A Telephone Company** Website - www.SATelephone.com

For questions, complaints or requests for additional information, please contact **S&A Telephone Company** at:

Business Office at
800.626.8859 Email at
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