

Coleman County Telephone **Broadband Internet Service** **Network Management Policy**

Coleman County Telephone Cooperative, Inc. (“Coleman County Telephone” or “Company”) provides this Policy in order to disclose its network management practices in accordance with the FCC’s Open Internet Rules. Information about Coleman County Telephone’s other policies and practices are available at www.cctelco.org/ (“Coleman County Telephone Website”).

Coleman County Telephone manages its network to ensure that all of its customers experience a safe and secure broadband Internet environment that is fast, reliable and affordable. Coleman County Telephone 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 video conferencing.

Coleman County Telephone manages its network for a number of reasons, including optimization, as well as congestion- and security-protocol-management. But, very few of Coleman County Telephone’s customers are impacted by the protocols and practices that the company uses to manage its network.

In addition to this Network Management Policy, patrons may also find links to the following on Coleman County Telephone’s website:

- [Frequently Asked Questions](#)
- [Acceptable Use Policy](#)

Coleman County Telephone’s Network Management Practices

Coleman County Telephone uses various tools and industry standard techniques to manage its network and deliver fast, secure and reliable Internet service. Such management tools and practices include the following:

I. Managing Congestion

Coleman County Telephone periodically monitors the connections on its network in the aggregate to determine the rate of utilization. If congestion emerges on the network, Coleman County Telephone will engage in the re-routing of Internet traffic to relieve congestion. In order to reduce instances of congestion, Coleman County Telephone may add capacity to its network when utilization has reached a pre-determined level. On our core and access networks, Coleman County Telephone may increase capacity by adding FTTH nodes, transport, Internet aggregation routers and bandwidth, as needed.

On Coleman County Telephone'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 of instances of congestion do occur Coleman County Telephone's network.

Customers using conduct that abuses or threatens the Coleman County Telephone network or which violates the company's Acceptable Use Policy or Internet service Terms and Conditions 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.

Coleman County Telephone'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. Coleman County Telephone's network management do not relate to any particular customer's aggregate monthly data usage.

II. Network Security

Coleman County Telephone 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 providing resources to its customers for identifying and reporting such threats as spam, viruses, firewall issues, and phishing schemes. Coleman County Telephone also deploys spam filters in order to divert spam from an online customer's email inbox while allowing the customer to control which emails are identified as spam.

As its normal practice, Coleman County Telephone does not block any protocols, content or traffic for purposes of network management except that the 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.

Except as may be provided elsewhere herein, Coleman County Telephone does not currently engage in any application-specific behaviors nor does it employ any device attachment rules for its network. Coleman County Telephone does currently block certain well-known ports that are commonly exploited on the Internet.

II. Technology

Coleman County Telephone's network management employs a variety of industry-standard tools, applications and devices to monitor, secure and maintain its network. The company uses Orion Network Performance monitoring to monitor aggregate traffic usage as well as employs spam detection.

IV. Monitoring Schedule

Coleman County Telephone uses network management software to conduct periodic monitoring of the network in order to detect abnormal traffic flows, congestion, network security breaches, malware, loss, and damage to the network. Monitoring functions are implemented on a quarter-hour time threshold basis. Various tools are used to monitor and respond as necessary.

V. Network Performance

Coleman County Telephone takes measurements of various components for network performance, analysis of the measurements to determine normal levels, and determination of appropriate threshold values to ensure required levels of performance for its network. Coleman County Telephone measures such components as mean upload/download speeds, latency, internal testing, and consumer speed tests to gauge network performance. The company monitors the values of these components to determine the overall performance of the network. The following is a best approximation of Coleman County Telephone's Network Management Performance based on the measured components: the company tests periodically for actual speeds and compared to advertised speeds, however, sustained upload and download speeds are not currently tested nor is latency. Performance measurement data is not currently collected.

VI. Specialized Services

Company does not currently offer any specialized services. Accordingly, customers' broadband experiences will not be impacted.

VII. Commercial Terms

A description of Coleman County Telephone's service offerings and rates may be found on Coleman County Telephone's website at the following link: www.cctelco.org. The company's Privacy Policy may be found on Coleman County Telephone's website also at the following link: www.cctelco.org.

For questions, complaints or requests for additional information, please contact the company at: 325/328-3124