Pembroke Advanced Communications

ISP Network Transparency Statement

Pembroke Advanced Communications ("PAC") provides this disclosure about the network practices, performance characteristics, and commercial terms applicable to PAC's broadband Internet access service in accordance with FCC 47 CFR § 8.1(a) rules.

PAC is committed to ensuring that we provide a safe and secure environment to our customers, and the content they desire. Our goal of responsibly managing our network is critical to the integrity, confidentiality, reliability, and security in providing the best online experience.

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

A. Network Transparency Disclosures

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

- **1. Blocking:** PAC does not block or discriminate against lawful content.
- 2. Throttling: PAC does not throttle, impair or degrade lawful Internet traffic.
- **3. Affiliated Prioritization:** PAC does not prioritize Internet traffic.
- **4. Paid Prioritization:** PAC does not engage in paid prioritization. We do not prioritize Internet for consideration to benefit particular content, applications, services or devices.
- 5. Congestion Management: PAC 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, PAC will take the appropriate measures to relieve congestion, including working closely with our intermediate transport carrier.

On PAC'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.

Customers using conduct that abuses or threatens the PAC network or which violates PAC's Acceptable Use Policy or 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.

PAC'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. PAC's network management practices do not relate to any particular customer's aggregate monthly data usage.

PAC monitors its network to check 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, PAC provides notification to the customer via email or phone. If a violation of PAC's policies has occurred and such violation is not remedied, PAC will seek to suspend or terminate that customer's service.

- **6. Application-Specific Behavior:** Except as may be provided elsewhere herein, PAC does not currently engage in any application-specific behaviors on its network. Customers may use any lawful applications with PAC.
- 7. Device Attachment Rules: There is a limit of one (1) DHCP session per account. For best results a router or other proprietary network gateways used on the PAC broadband network should be provided by PAC. Customers may attach devices of their choosing to their 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 PAC's network or impair the service of other customers. PAC 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 PAC'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: PAC knows the importance of securing its network and customers from network threats and annoyances. Network monitoring consists of abnormal traffic flow detection, congestion, security breaches, malware, loss, and damage to the network. PAC promotes the security of its network and patrons by protections from such threats as spam, viruses, firewall issues, and phishing schemes. PAC 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 14 days.

As its normal practice, PAC does not block any protocols, content or traffic for purposes of network management, but PAC 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 Service Performance

1. Service Description: PAC has a FTTH network of nearly 300 miles covering 100% of its service area to both residential and business subscribers. Our digital fiber network is capable of offering speeds as high as 1 Gig at affordable prices, including a hosted VoIP solution and also IP-based high definition television on one of the most technically advanced platforms.

2. Network Performance: PAC 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 PAC's network. PAC measures network availability, aggregate utilization, and latency – maintaining latency of 15-45 milliseconds across its network. Broadband services to customers in a specific tier are rate limited and do not allow for burst speeds. Customers must make determination of suitability of service for real time application within their home performance.

Customer's service performance may be affected by one or more of the following: particular websites being accessed; capacity in the public Internet beyond PAC's network; customer's computer and equipment; and inside wiring at customer's premise. Customers must consider the capabilities of their own equipment, and suitability of services such as real-time applications, to determine their needs in choosing a broadband plan.

PAC tests each service for actual and expected access speeds at the time of network installation, and periodically as needed, to demonstrate that the service is capable of supporting the advertised speed. Customers may also test their actual speeds using the speed test link on our website located at www.PACfiber.com. Additional assistance can be reached by calling our business office at 912-653-4389, technical support service at 912-653-4000 or by email at customerservice@PACfiber.com.

3. Impact of Non-Broadband Internet Access Service (BIAS) Data Services:

Real time services, such as Non-BIAS services including Voice over Internet Protocol (VoIP) and Internet Protocol (IP) video, command optimal bandwidth. PAC's fully fiber network offers IP video service which will not adversely affect our last-mile capacity or performance of broadband Internet access service. For quality purposes, PAC's VoIP services are given priority over the customer's broadband Internet access service. However, this prioritization will not affect PAC's last mile of fiber optic network.

C. Commercial Terms

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

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

- Privacy Policy
- Acceptable Use Policy

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

Business Office at (912) 653-4389 Email at <u>Customerservice@PACfiber.com</u>