HTC, INC.

NETWORK MANAGEMENT POLICY

HTC provides this Policy in order to disclose its network management practices in accordance with the FCC's Open Internet Rules. Information about **HTC**'s other policies and practices concerning broadband are available at **www.hartcom.net**.

HTC manages its network to ensure that all of its customers experience a safe and secure broadband Internet environment that is fast, reliable and affordable. **HTC** 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.

HTC manages its network for a number of reasons, including optimization, as well as congestion- and security-protocol-management. **HTC**'s customers generally will not be impacted by the protocols and practices that **HTC** uses to manage its network.

HTC's Network Management Practices

HTC 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**

HTC 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, **HTC** will take the appropriate measures to relieve congestion.

On **HTC**'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 **HTC**'s network.

Customers using conduct that abuses or threatens the **HTC** 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.

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

II. Network Security

HTC 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. **HTC** 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, **HTC** 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.

III. Device Attachment Rules/Application Specific Behaviors

For best results, DSL modems, wireless modems, or other proprietary network gateways used on the **HTC** broadband network should be provided by **HTC**. 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 **HTC**'s network or impair the service of other customers. **HTC** 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 **HTC**'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.

IV. Monitoring Schedule

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

V. Network Management Technology

HTC employs a variety of industry-standard tools, applications and devices to monitor, secure and maintain its network, including the following:

-network graphing solutions;
-software to monitor SNMP network devices;
-port monitors;
-electronic alert notifications;
-diagnostic protocols;
-spam and virus protection on inbound & outbound email

VI. Service Descriptions

HTC offers broadband service over ADSL2+, Cable Modem, and Fiber facilities. You may find more information on **HTC**'s service offerings and rates at **www.hartcom.net**.

VII. Network Performance

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

HTC 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 can also test their actual speeds and may request assistance by calling our business office at **706.376.4701** or by email **support@hartcom.net**.

Based on the network information **HTC** receives from its monitoring efforts, **HTC**' network is delivering data transmission rates advertised for the different high-speed Internet services. To be sure, **HTC** 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. **HTC** reports the results of this testing below. This result applies for measurements made both at peak times and over a 24-hour period:

NETWORK PERFORMACE – DOWNLOAD SPEEDS AT PEAK TIMES

ADVERTISED	ACTUAL	PERCENTAGE DIFFERENTIAL
4 Mbps	3.97	.7528
9 Mbps	8.87	1.455
15 Mbps	15.5	3.2787
30 Mbps	28.8	4.0816
50 Mbps	48.8	2.4291

NETWORK PERFORMACE –DOWNLOAD SPEEDS OVER 24-HR PERIOD

ADVERTISED	ACTUAL	PERCENTAGE DIFFERENTIAL
4 Mbps	3.97	.7528
9 Mbps	8.88	1.3423
15 Mbps	15.4	2.6316
30 Mbps	28.8	4.0816
50 Mbps	48.7	2.6342

VIII. Impact of Non-BIAS Services

The FCC has defined Non-Bias Data Services to include services offered by broadband providers that share capacity with the Broadband Internet Access Service (BIAS) also offered by the provider over the last-mile facilities. These services include Voice over Internet Protocol (VoIP) and Internet Protocol (IP) video services.

HTC provides Voice-over-the-Internet-Protocol (VoIP) to its wireline customers. 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.

IX. Commercial Terms

In addition to this Network Management Policy, patrons may also find links to the following on the **HTC** Website:

- **Frequently Asked Questions ("FAQs")**
- **Acceptable Use Policy**
- **Internet Service Agreement**

- **Broadband Service Offerings and Rates**
- **Privacy Policy**

For questions, complaints or requests for additional information, please contact **HTC**

at: Business Office **706.376.4701** or Email **support@hartcom.net**