

## LONSDALE TELEPHONE COMPANY

### BROADBAND INTERNET SERVICE DISCLOSURES

Consistent with FCC regulations,<sup>1</sup> Lonsdale Telephone Company provides this information about our broadband Internet access services. We call these services our High Speed Internet Service. We welcome questions or comments about this information. You may contact us at: [lonsdaletel@means.net](mailto:lonsdaletel@means.net) or (507) 744-2311.

#### NETWORK PRACTICES

**General description.** We provide a variety of High Speed Internet Service offerings to our residential and business customers. We provide the service over our broadband network and through third party fiber optic lines connecting to the Internet. We also contract with one or more companies for certain network monitoring and management services. We monitor our network and traffic patterns and make changes we deem necessary to manage and improve overall network performance. We use reasonable, nondiscriminatory, network management practices to improve overall network performance to ensure a high-quality online experience for all users. Our network management practices do not target any specific content, application, service, or device. As network management issues arise and as technology develops, we may employ additional or new network management practices. We will update these disclosures as necessary.

**Related documents and disclosures.** Use of our High Speed Internet Service is also governed by:

- Acceptable Use Policy, available at [www.lonsdaletel.com/index\\_files/LonsdaleTelephoneAUP103011.pdf](http://www.lonsdaletel.com/index_files/LonsdaleTelephoneAUP103011.pdf).
- High Speed Internet Service Terms and Conditions of Service, available at [www.lonsdaletel.com/index\\_files/LonsdaleTelephoneHighSpeedInternetTermsAndConditions103011.pdf](http://www.lonsdaletel.com/index_files/LonsdaleTelephoneHighSpeedInternetTermsAndConditions103011.pdf).
- High Speed Internet Service Overview, available at [www.lonsdaletel.com/index\\_files/LonsdaleTelephoneProductdefinitionAndMinimumEquipment103011.pdf](http://www.lonsdaletel.com/index_files/LonsdaleTelephoneProductdefinitionAndMinimumEquipment103011.pdf).

**Congestion management.** We describe in this section network management practices used to address congestion on our network.

#### **Congestion management practices used.**

Network monitoring. We monitor our network for utilization trends. We generate regular reports showing changes in network traffic and congestion. We use this information to plan increases in bandwidth available, port additions, or additional connectivity to the Internet.

**Types of traffic affected.** Our congestion management practices do not target any specific content, application, service, or device.

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<sup>1</sup> 47 CFR 8.3 and *In re: Preserving the Open Internet, Broadband Industry Practices, Report and Order*, 22 FCC Rcd 17905 (2010).

**Purposes of congestion management practices.** Our High Speed Internet network is a shared network. This means that our customers share upstream and downstream bandwidth. The goal of our congestion management practices is to enable better network availability and speeds for all users. Our congestion management practices serve to:

- Help us adapt and upgrade our network to maintain or improve network performance as demand for our broadband Internet access service increases.
- Help us adapt and upgrade our network to maintain or improve network performance as demand for higher bandwidth applications increases. Some examples of higher bandwidth applications are gaming, streaming movies, and streaming high definition video.

**Congestion management criteria.**

Network monitoring. Our network monitoring provides data to help us plan upgrades to our network, equipment, technology, and connectivity to the Internet. As demand for our broadband Internet access service increases, and as demand for higher bandwidth applications increases, we monitor effects on network performance and plan upgrades as we deem necessary. We have not established specific criteria to govern our upgrade decisions.

**Effects on end user experience.** Because our broadband network is a shared network, periods of high network demand may result in Internet traffic congestion. End users may experience reduced bandwidth or speed during these times.

**Typical frequency of congestion.** Congestion tends to occur during periods of peak demand for higher bandwidth applications. Generally, the frequency of congestion tends to increase daily during 8 pm – 2 am.

**Application-Specific Practices.** This section discloses any application-specific practices we use, if any.

**Management of specific protocols or protocol ports.** Not applicable.

**Modification of protocol fields.** Not applicable.

**Applications or classes of applications inhibited or favored.** Not applicable.

**Device Attachment Rules.** This section addresses any limitations on attaching lawful devices to our network.

**General restrictions on types of devices to connect to network.** We place no general restrictions on lawful devices that a customer may connect to our network, so long as the device is: (i) compatible with our network; and (ii) does not harm our network or other users. Beyond that, our High Speed Internet service works with most types of PCs and laptops including Macs, and other Internet compatible devices like game systems and Internet-enabled TVs. If a wireless router is connected to our High Speed Internet service, wireless Internet compatible devices including computers, tablets, smartphones, and other devices can connect to our network. If a customer or potential customer believes they have an unusual configuration, we will help determine if there is a compatibility problem.

Certain equipment is required to connect to our network for High Speed Internet service. The specific equipment varies with the type of service.

DSL Equipment. Where our FTTH network is unavailable, our High Speed Internet Service requires connection of a DSL modem to our network. To connect to our High Speed Internet you must obtain a DSL modem from us. If you have questions about our modem compatibility, please contact us.

FTTH Equipment. To use our High Speed Internet service delivered via FTTH, we must install an Optical Network Terminal (ONT) at the customer's premises. The ONT then connects via a cable to a device called a Residential Gateway (RG). The customer connects a computer or other Internet enabled device to the RG through a Network Interface Card (NIC) for a wired connection or through a wireless antenna for a wireless device. A customer may obtain an RG from Lonsdale or may use a compatible commercially available RG. If a customer has a question about RG compatibility, our customer service department will help.

**Network and End User Security.** This section provides a general description of the practices we use to maintain security of our network.

**Practices used to ensure end user security, including triggering conditions.**

Hostile port blocking. We do not block ports, unless our network comes under attack from viruses or other "malware." In such cases, we block that specific port until the attack ceases, at which time we remove the block.

Virus and spam filtering. We use a third party provider(s) to filter email and website traffic for virus activity and Spam using industry standard virus scanning and prevention techniques. Should an email message be found to contain a virus or other harmful content, the third party provider will notify the sender and/or the intended recipient(s) and quarantine the message.

**Practices used to ensure security of the network, including triggering conditions.**

Hostile port blocking. We do not block ports, unless our network comes under attack from viruses or other "malware." In such cases, we block that specific port until the attack ceases, at which time we remove the block.

Virus and Spam filtering. We use third party provider(s) to offer email and personal web site hosting. Our third party partner(s) filter email and website traffic for virus activity and Spam using industry standard virus scanning and prevention techniques.

**PERFORMANCE CHARACTERISTICS**

**General Service Description.** Our High Speed Internet Service enables a customer to connect an Internet-enabled device through a wired connection. Through our High Speed Internet Service, we serve as a local Internet service provider. Our High Speed Internet Service enables residential and commercial subscribers to access all lawful content, applications, and services of their choice available on the Internet.

**Service technology.** We deliver our High Speed Internet service through two different service technologies, DSL and FTTH. The equipment required to connect a computer or other device to the

Internet depends on the type of High Speed Internet service used. Our network is a shared network, which means that our customers share upstream and downstream bandwidth.

### **Expected and actual speeds and latency.**

**Expected performance.** We offer customers a variety High Speed Internet Service levels. We provide a description of the expected maximum transfer speeds associated with each service level in our High Speed Internet Service Overview, available at [www.lonsdaletel.com/index\\_files/LonsdaleTelephoneProductdefinitionAndMinimumEquipment103011.pdf](http://www.lonsdaletel.com/index_files/LonsdaleTelephoneProductdefinitionAndMinimumEquipment103011.pdf).

**Speed.** The speeds we identify for each High Speed Internet Service level are the maximum upload and download speeds that customers are likely to experience. We provision our customers' modems and engineer our network to deliver the speeds to which our customers subscribe. However, we do not guarantee that a customer will actually achieve those speeds at all times. A variety of factors can affect upload and download speeds, including customer equipment, network equipment, congestion in our network, congestion beyond our network, performance issues with an Internet application, content, or service, and more.

**Latency.** Latency is another measurement of Internet performance. Latency is the time delay in transmitting or receiving packets on a network. Latency is primarily a function of the distance between two points of transmission, but also can be affected by the quality of the network or networks used in transmission. Latency is typically measured in milliseconds, and generally has no significant impact on typical everyday Internet usage. As latency varies based on any number of factors, most importantly the distance between a customer's computer and the ultimate Internet destination (as well as the number and variety of networks your packets cross), it is not possible to provide customers with a single figure that will define latency as part of a user experience.

**Actual speed and latency performance.** Actual speed and latency may vary depending upon network conditions and other factors. To ensure that our customers receive the performance that they expect, we overprovision our system. Actual performance of our broadband Internet access service in most cases should conform to national wireline broadband Internet speed and latency levels reported by the FCC.<sup>2</sup>

**DSL.** The FCC has reported that customers of DSL-based broadband Internet services receive mean download speeds that are within 82 % of advertised speeds during non-peak hours, and 77.5% of advertised speeds during peak hours.<sup>3</sup> In addition, the FCC has reported that these same

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<sup>2</sup> See FCC's Office of Engineering and Technology and Consumer Affairs Bureau, *Measuring Broadband, A Report on Consumer Wireline Broadband Performance* in the U.S., OET CGB DOC-308828A1, pp. 4-6 (Aug. 2, 2011) (available at: [http://transition.fcc.gov/cgb/measuringbroadbandreport/Measuring\\_U.S. - Main\\_Report\\_Full.pdf](http://transition.fcc.gov/cgb/measuringbroadbandreport/Measuring_U.S. - Main_Report_Full.pdf)).

<sup>3</sup> The FCC has defined peak hours measured during "busy hour" as weeknights between 7:00 pm and 11:00 pm local time.

customers experience average latency<sup>4</sup> delays of 44 milliseconds, increasing by an average of 47 milliseconds during peak hours

FTTH. The FCC has reported that customers of fiber-to-the-home based broadband Internet services receive mean download speeds that are within 114% of advertised speeds during non-peak hours, and 113.5% of advertised speeds during peak hours.<sup>5</sup> In addition, the FCC has reported that these same customers experience average latency<sup>6</sup> delays of 17 milliseconds, increasing by an average of 18 milliseconds during peak hours.

**Suitability of the Service for Real-time Applications.** Our High Speed Internet Service is suitable for typical real-time applications including messaging, voice applications, video chat applications, gaming, and Internet video. If users or developers have questions about particular real-time applications, please contact us at [lonsdaletel@means.net](mailto:lonsdaletel@means.net) or (507) 744-2311.

### **Specialized Services.**

**Specialized services offered to end users.** We offer several specialized services over our network that share network capacity with our High Speed Internet Service. Our specialized services include Internet Protocol Television.

**Effects of specialized services on availability and performance of broadband Internet access service.** Our specialized services have no effect on the availability and performance of our High Speed Internet Service.

## **COMMERCIAL TERMS**

**Prices.** Monthly prices for our broadband Internet access service are available at [http://lonsdaletel.com/index\\_files/Page399.htm](http://lonsdaletel.com/index_files/Page399.htm).

**Usage-based fees.** Not applicable.

**Fees for early termination.** Not applicable.

**Fees for additional network services.** Additional fees for network services may be applicable. For more information on additional network service, please visit our website at [http://lonsdaletel.com/index\\_files/Page399.htm](http://lonsdaletel.com/index_files/Page399.htm).

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<sup>4</sup> The FCC has defined latency is the total length of time it takes a signal to travel from an origination point to the nearest server, plus the time for an acknowledgement of receipt to travel back to the origination point. The nearest server is the server providing the minimum round trip time.

<sup>5</sup> The FCC has defined peak hours measured during “busy hour” as weeknights between 7:00 pm and 11:00 pm local time.

<sup>6</sup> The FCC has defined latency is the total length of time it takes a signal to travel from an origination point to the nearest server, plus the time for an acknowledgement of receipt to travel back to the origination point. The nearest server is the server providing the minimum round trip time.

**Privacy Policies.** We do not disclose High Speed Internet Service customer or use information to third parties except: (i) as necessary to provide our High Speed Internet Service and to manage our network; or (ii) in response to law enforcement requests, court order, or as otherwise required or authorized by law.

**Inspection of network traffic.** We routinely monitor network and traffic patterns.

Traffic Monitoring. We monitor network traffic to trends. We generate regular reports showing changes in network traffic and congestion. We use this information to plan increases in bandwidth available, port additions, or additional connectivity to the Internet.

Virus and Spam filtering. Through our third party provider, we filter email and web space traffic for virus activity and Spam using industry standard virus scanning and prevention techniques.

**Storage of network traffic information.** Dynamic Host Configuration Protocol (DHCP) information is a code included in all network traffic that associates that traffic with a particular customer device sending or receiving the traffic. We store DHCP information for at least 1 year.

**Provision of network traffic information to third parties.** We do not disclose High Speed Internet Service customer or use information to third parties except: (i) as necessary to provide our High Speed Internet Service and to manage our network; or (ii) in response to law enforcement requests, court order, or as otherwise required or authorized by law.

**Use of network traffic information for non-network management purposes.** Not applicable.

**Redress Options.** End users or edge providers with complaints or questions relating to these disclosures should contact: Bonnie Simon at (507) 744-2311.

**Practices for resolving end-user and edge provider complaints and questions.** We will endeavor to answer questions promptly via email or voice. For written complaints, we will provide an initial response in writing within 15 business days of receipt. We will attempt to resolve complaints informally, escalating the matter to senior management if needed.