

Bulloch County Rural Telephone Cooperative, Inc.

Network Transparency Statement

Bulloch County Rural Telephone Cooperative, Inc. (Bulloch Telephone) provides this Network Transparency Statement in accordance with the FCC's Restore Internet Freedom Rules to ensure that potential subscribers have sufficient information to make informed choices about the purchase of broadband services. Information about Bulloch Telephone's other policies and practices concerning broadband are available at www.bulloch.net (Bulloch Telephone Website).

Bulloch Telephone engages in network management practices that are tailored and appropriate for achieving optimization within the network considering the network architecture and technology of its broadband Internet access service. Bulloch Telephone's goal is to ensure that all customers experience a safe and secure broadband Internet environment that is fast, reliable and affordable. Bulloch Telephone wants its customers to indulge in all that the Internet has to offer, whether it is social networking, streaming videos and music, or communicating through email and videoconferencing with equal access.

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

A. Bulloch Telephone's Network Transparency Disclosures

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

1. **Blocking:** Bulloch Telephone does not engage in any practice that blocks access to or discriminates against lawful content, applications, services, or non-harmful devices.
2. **Throttling:** Bulloch Telephone does not throttle, impair or degrade lawful Internet traffic.
3. **Affiliated Prioritization:** Bulloch Telephone does not prioritize Internet traffic and has no plans to do so.
4. **Paid Prioritization:** Bulloch Telephone has never engaged in paid prioritization. We do not prioritize Internet access for the benefit of particular content, applications, services or devices. Bulloch Telephone does not have plans to enter into paid prioritization deals to create fast lanes.
5. **Congestion Management:** Bulloch Telephone monitors the aggregate connections on its network daily to determine the rate of utilization. If congestion emerges on the network, Bulloch Telephone will take the appropriate measures to relieve congestion.

On Bulloch 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 if instances of congestion do occur on Bulloch Telephone's network.

Customers using conduct that abuses or threatens the Bulloch Telephone network or which violates the company's Acceptable Use Policy, or the Subscriber 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.

Bulloch 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. Bulloch Telephone's network management practices do not relate to any particular customer's aggregate monthly data usage. Bulloch Telephone monitors its network daily to determine utilization on its network.

Bulloch Telephone also checks for abnormal traffic flows, network security breaches, malware, loss, and damage to the network. If a breach is detected or inappropriate users are brought to light by complaint, Bulloch Telephone provides notification to the customer via US mail or phone. If a violation of Bulloch Telephone's policies has occurred and such violation is not remedied, Bulloch Telephone will seek to suspend or terminate that customer's service.

6. **Application-Specific Behavior:** Except as may be provided elsewhere herein, Bulloch Telephone does not currently engage in any application-specific behaviors on its network. Customers may use any lawful applications with Bulloch Telephone's Broadband Service.
7. **Device Attachment Rules:** Customer devices must use either DHCP or PPPoE to connect to Bulloch Telephone's network as indicated at the time of service installation. There is a limit of one (1) public IP address per account. Additional public IP addresses may be provided upon customer request at the current billing rate. For best results, routers or other proprietary network gateways used on the Bulloch Telephone broadband network should be provided by Bulloch Telephone. Customers may attach devices of their choosing to their service, 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 Bulloch Telephone's network or impair the service of other customers. Bulloch Telephone 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 Bulloch Telephone'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:** Bulloch Telephone knows the importance of securing its network and customers from network threats and annoyances. The company promotes the security of its network and subscribers by protections from such threats as Denial of Service attacks, spam, viruses, firewall issues, and phishing schemes. Bulloch Telephone 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, Bulloch Telephone does not block any protocols, content or traffic for purposes of network management, but Bulloch Telephone 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

Bulloch Telephone deploys Internet access to its subscribers through hardwired fiber to the home (FTTH) technology.

2. Network Performance

Bulloch Telephone 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 Bulloch Telephone's network. Bulloch Telephone 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 Bulloch Telephone'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 Bulloch Telephone broadband service. Your computers and/or wireless or other networks in your homes or offices may need an upgrade to take full advantage of the chosen Bulloch Telephone broadband plan.

All services are best effort. Bulloch Telephone 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 www.speedtest.bulloch.net or the link on Bulloch Telephone's website www.bulloch.net and may request assistance by calling our business office at 912-865-1100.

Based on the network information Bulloch Telephone receives from its monitoring efforts, Bulloch Telephone's network is delivering data transmission rates advertised for the different high-speed Internet services. To be sure, Bulloch Telephone 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. Bulloch Telephone 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

Advertised	Actual Sustained	Percentage Differential
Download*		
25 Mbps	25 Mbps	0%
100 Mbps	100 Mbps	0%
1 Gig**	940 Mbps**	7%
Upload*		
3 Mbps	3 Mbps	0%
10 Mbps	10 Mbps	0%
100 Mbps	100 Mbps	0%

*Actual provisioned Download/Upload data rates have been 'tuned' to provide the advertised data rates in all cases other than Gigabit service. For Gigabit services we simply remove all bandwidth limitations on the connection.

**Gigabit wireline speed is 940Mbps (max theoretical with MTU of 1500) results achieved testing this service varies wildly depending on equipment used. Bulloch Telephone cannot guarantee that any user will achieve the full bandwidth results from our testing without using equipment that is specifically capable of achieving these results.

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. Real time non-BIAS services offered by Bulloch Telephone, such Internet Protocol (IP) video services (LightView TV) and Voice Service, command optimal bandwidth. As Non-BIAS traffic is combined with general Internet traffic on Bulloch Telephone's network, broadband customers could experience service delays, although very unlikely, if there is an occurrence of congestion on BULLOCH TELEPHONE's network. In any such event, the Non-BIAS traffic is given priority over general Internet traffic.

C. Commercial Terms

Pricing and additional service information may be found at www.bulloch.net

In addition to this Network Transparency Statement, subscribers may also find links to the following on the BULLOCH TELEPHONE Website:

- Acceptable Use Policy
- Bulloch Privacy Policy
- Bulloch Bylaws
- FAQ

For questions, complaints or requests for additional information, please contact Bulloch Telephone at:

Business Office at 912-865-1100

By email at: bullnet@bulloch.net