**Open Internet Transparency Statement**

ISP Management, Inc. and Technology Network Communication Access LLC hereafter referred to as “ISP” strives to provide consumers with accessible, easy-to-understand information about the services we provide, so they can make informed decisions about which services best meet their needs.

Additionally, the Federal Communications Commission (“FCC”) requires that ISP and other providers of broadband internet access services disclose certain information regarding those internet services. The information required for disclosure under the FCC’s rules is found below. To assist you in finding the information you’re looking for, we highlight below information that the FCC specifically calls for in the Open Internet Disclosures.

**1. Network Practices.** ISP does not discriminate against lawful internet content, applications, services, or non-harmful devices. ISP does engage in reasonable network management practices described below.

**2. Blocking.** ISP does not block or otherwise prevent end user access to lawful content, applications, services, or non-harmful devices. ISP does engage in reasonable network management practices described below.

**3. Throttling.** ISP does not degrade or impair access to lawful internet traffic on the basis of content, application, service, user, or use of a non-harmful device. ISP does engage in reasonable network management practices described below and in our Network Management Information Center.

**4. Affiliated Prioritization.** ISP does not directly or indirectly favor some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, to benefit an affiliate.

**5. Paid Prioritization.** ISP does not directly or indirectly favor some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, in exchange for consideration, monetary or otherwise.

**6. Network Management.** ISP manages its network with one goal: to deliver the best possible broadband internet access service to all of its customers. To further this effort, ISP uses reasonable network management practices that are consistent with industry standards. ISP uses various tools and techniques to manage its network, deliver its service, and ensure compliance with the Acceptable Use Policy and the Terms of Service. These tools and techniques are dynamic and can and do change frequently. Network management activities may include identifying spam and preventing its delivery to customer email accounts, and detecting malicious internet traffic and preventing the distribution of, or inadvertent access to, malware, phishing, viruses, or other harmful code or content.

As the internet and its related technologies continue to evolve, ISP’s network management tools will also keep pace so we can deliver an excellent, reliable, and safe experience to all of our customers. As such, this disclosure will be revised periodically as those changes are made.

Actual internet speeds vary from the advertised maximum speed and are **NOT guaranteed**. The “actual” speed that a customer will experience while using the service depends on a number of conditions, including:

* 1. **Performance of a customer’s computer**, smartphone, tablet, or other internet-connected device, including factors such as its age, processing capability, operating system, the number of applications running simultaneously, and the presence of any adware and viruses.
	2. **Type of connection between a customer’s computer and modem**. For example, in-home wireless connections, e.g., WiFi, between the device and the router or modem generally may be slower than wired connections. In-home wireless connections also may be subject to greater performance fluctuations, caused by factors like interference, attenuation, and congestion. ISP recommends that customers confirm that their in-home wireless connections are able to support the speeds that the ISP’s services deliver.
	3. **The distance and time it takes packets to travel** between a customer’s modem and their final destination on the internet, or their point of origination and a customer’s modem, including the number and quality of the networks of various operators in the transmission path. The internet is a “network of networks.” A customer’s internet traffic may traverse the networks of multiple providers before reaching its destination, and the capabilities of those networks, as well as the capacity of the facilities the edge provider (i.e., any provider of content, applications, or services over the internet) has chosen to route its traffic to the ISP’s network (and the interconnection capacity it has arranged), may affect the overall speed of an internet connection.
	4. **Congestion or high usage levels at the edge provider or destination**. When you access an edge provider or particular destination that is being visited by others at the same time, you may experience a slower connection if the edge provider or destination does not have sufficient capacity to serve all of the visitors efficiently at the same time.
	5. **Gating of speeds or access by the edge provider or destination**. To control traffic or performance, many edge providers limit the speeds at which a visitor can download from their site. Those speed limitations will carry through to a customer’s connection.
	6. **The performance of the cable modem you have installed**. Modem performance may degrade over time, and certain modems are not capable of handling higher speeds, such as DOCSIS 2.0 devices or early DOCSIS 3.0 devices.

ISP currently utilizes a subscription service to assist with managing the quality of experience and fair access policies. As our network technologies and usage of the network continue to evolve, we reserve the right to implement a additional congestion management system(s) if necessary.

**7. Application-Specific Behavior.** ISP provides its broadband internet access service customers with full access to all the lawful content, services, and applications that the internet has to offer. ISP does not block or rate-control specific protocols or protocol ports (except to prevent spam, malicious attacks, and identity theft), does not modify protocol fields in ways not prescribed by protocol standards, and does not otherwise inhibit or favor certain applications or classes of applications.

**8. Security.** ISP employs a number of practices to help prevent unwanted communications, such as spam, and protect the security of ISP’s customers and network. We limit the number of login, SMTP, DNS, and DHCP transactions per second (at levels far above “normal” rates) that customers can send to our servers in order to protect them from Denial of Service (DoS) attacks. (We do not disclose exact rate limits in order to maintain the effectiveness of these measures.) In order to further protect our customers, ISP blocks a limited number of ports that are commonly used to send spam, launch malicious attacks, or steal a customer’s information.

**9. Pricing and Other Fees.** ISP’s broadband internet access services may be subject to promotional rates. Additional fees, such as for equipment rental, installation, and early termination fees and paper statement fees may apply.