Network Management Policy

West Carolina Rural Telephone Cooperative and West Carolina Communications ("West Carolina" or "Company") provides this Policy in order to disclose its network management practices in accordance with the FCC's Open Internet Rules and to provide our members and subscribers additional information about West Carolina's network management practices. Additional Information about West Carolina's other policies and practices concerning broadband service are also available at www.westcarolina.com under the Internet section, select Legal Disclosures for documentation.

West Carolina manages its network to ensure that all of its customers experience a safe and secure broadband Internet environment that is fast, reliable and affordable. West Carolina wants its customers to indulge in all the Internet has to offer, whether it is social networking, streaming videos and music, or communicating through email and videoconferencing.

West Carolina manages its network for a number of reasons, including optimization, as well as congestion- and security-protocol-management. Such practices are consistent with reasonable network management actions and are intended to improve the overall performance for customers.

West Carolina's Network Management Practices

West Carolina 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

West Carolina periodically monitors the connections on its network in the aggregate to determine the rate of utilization. West Carolina has deployed a non-blocking Internet architecture in the majority of its network. Except of the facilities closest to the customer, the network has redundant facilities on separate links. In addition, West Carolina has purchased service that allows for bursts of speed. West Carolina adds capacity when it finds the current facilities are nearing capacity. The facilities closest to the customer are sized to fully meet the advertised bandwidth sold to the customer. West Carolina may increase capacity by adding Fiber-to-the-home (FTTH) nodes, transport, Internet aggregation routers, and bandwidth, as needed to accommodate additional services and increased speeds.

On West Carolina's network, all customers have access to all legal services, applications and content online and, in the unlikely 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 occur on West Carolina's network.

Customers using conduct that abuses or threatens the West Carolina 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.

West Carolina'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. West Carolina's network management practices do not relate to any particular customer's aggregate monthly data usage. West Carolina does not prioritize or discriminate against any applications or protocols except for specialized networks and does not honor quality of service indicators from other carriers.

II. Network Security

West Carolina 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 providing resources to its customers for identifying and reporting such threats as spam, viruses, firewall issues, and phishing schemes. West Carolina also deploys spam filters in order to divert spam from an online customer's email inbox while allowing the customer to control which emails are identified as spam. Spam is quarantined in a separate file that the customer may access.

Email in such file will be automatically deleted if not accessed up to 14 days.

As its normal practice, West Carolina 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. West Carolina does filter ports to reduce the spread of computer-related viruses and protecting your computer from intruder access. If West Carolina suspects traffic originated by its customers is virus related, West Carolina will contact the suspected party. If there is no response, the customer's service will be suspended until the issue can be resolved.

West Carolina does not currently engage in any application-specific behaviors in its network, except as may be listed in the Specialized Service section of this policy.

III. Monitoring Schedule

West Carolina has software that monitors the network for performance and provides performance results regularly. Alarms or alerts are generated if the performance is degraded. In addition,

Traffic is analyzed and trended to ensure peak performance. When utilization nears capacity West Carolina adds additional bandwidth or reroutes traffic to relieve congestion. West Carolina also uses industry standard software tools 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, West Carolina provides notification to the customer via email or phone. If a violation of West Carolina's policies has occurred and such violation is not remedied, West Carolina will seek to suspend or terminate that customer's service.

IV. Network Management Technology

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

- Network graphing solutions
- Latency measurement software
- Bandwidth and performance measurement platforms

V. Service Descriptions

West Carolina offers broadband service over DSL, and FTTH facilities. West Carolina offers several different service tiers ranging from 15 Mbps to 8 Gbps. West Carolina reserves the right to change service tiers at any time. Not all service tiers are offered on all technologies. Service offerings are detailed in the Internet section of the website westcarolina.com/internet.

VI. Network Performance

West Carolina broadband services are best effort performance. The customer's bandwidth is limited to the maximum of the service tier purchased. Since the vast majority of the network is FTTH and the links are non-blocking, West Carolina expects their network to deliver the advertised speeds. If the customer does not receive their advertised speeds West Carolina will dispatch repair technicians to customer sites to perform speed tests as needed to troubleshoot and resolve speed and application performance issues that are caused by West Carolina's network. West Carolina measures availability, latency, and aggregate utilization on the network and strives to meet internal service level targets in its network. However, the customer's performance is also affected by the particular website being accessed, capacity in the public Internet beyond the West Carolina network and the customer's computer, inside wiring, wireless router, and other customer equipment.

West Carolina is in the process of developing additional systems/processes that will allow us to measure the performance of the West Carolina controlled network compared to advertised speeds. Once these systems are developed, West Carolina will disclose the results on its website.

VII. Specialized Services

West Carolina provides Internet protocol television (IPTV) services to end users. This service, also known as a Specialized Service, is separated from the company's best effort Internet services on the network. Since Specialized Service traffic has dedicated bandwidth that is separated from best effort broadband Internet traffic, our broadband customers will experience no impact on broadband services resulting from Specialized Service traffic.

VIII. Deployment of Passpoint/Hotspot 2.0 Technology

West Carolina enables Passpoint/Hotspot 2.0 ("Hotspot 2.0") by default on Hotspot 2.0-capable routers that are deployed in customer premises. (This protocol is the underlying wireless standard for SmartTown® managed service ecosystem created by Calix, of which WiFi X is a component.) Hotspot 2.0, which is based on the IEEE 802.11u technical standard, creates a safe, secure and encrypted public aggregated network that is walled off from customers' internal home or business Wi-Fi networks. The Hotspot 2.0 public network serves two functions. First, it is accessible by participating West Carolina mobile customers on their devices as a complementary part of their service when they're on the go, both inside and outside West Carolina's service area, with no captive portal or manual login required (for more information about Hotspot 2.0 and SmartTown®, please visit westcarolina.com/smarttown). Second, Hotspot 2.0 will make the communities within West Carolina's service territory safer, as West Carolina will provide access to first responders, enhancing emergency response capability. West Carolina customers may opt out of Hotspot 2.0 participation by contacting West Carolina at 844.303.4237. Upon receipt of an opt-out request, Hotspot 2.0 functionality will be disabled on the customer's router, and customer will no longer be able to access the Hotspot 2.0 network.

IX. Device Attachment Rules

West Carolina customer may attach any device to the network that meets consumer electronics standards and is not harmful to the network.

X. Other Notices

In addition to this Network Management Policy, other policies and practices concerning broadband service are available at westcarolina.com/legal.

For questions, complaints or requests for additional information, please contact West Carolina at 844.303.4237.

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