

## **Hershey Cooperative Telephone Company Network Management Practices Policy**

Pursuant to the Federal Communications Commission's newly enacted Open Internet Rules found in Part 8 of Title 47 of the Code of Federal Regulations, the policies of Hershey Cooperative Telephone Company ("Provider") regarding network management practices, performance characteristics, and commercial terms are provided in entirety so that Provider's current customers, prospective customers, third-party content providers and other interested parties can make informed choices regarding the broadband Internet access services offered by Provider, and the extent Provider's network management practices may affect those services.

### **Network Management Practices**

In the interest of providing the best online experience possible for all of Provider's customers, Provider utilizes reasonable network management practices tailored to achieve legitimate network management purposes. Because bandwidth is a limited resource for broadband Internet service providers, it is essential that Provider reasonably manages its network to promote the use and enjoyment of the Internet by all of Provider's customers. By engaging in reasonable and responsible network management, Provider prevents its customers from being subjected to the negative effects of spam, viruses, security attacks, network congestion, and other risks that threaten to degrade service. The network management practices employed by Provider are consistent with industry standards.

#### **Congestion Management**

Provider does not employ any congestion management tools, practices and/or software on network traffic.

#### **Application-Specific Behavior**

Provider blocks all traffic to and from a short list of internet ports, long known to be used nearly exclusively to replicate viruses, network attacks, and for other non-legitimate network traffic. Those ports are:

- TCP and UDP port 53
- TCP and UDP port 55
- TCP and UDP port 77
- TCP ports 135 through 139
- TCP port 445
- UDP port 135
- TCP port 4444
- TCP and UDP ports 1433 and 1434

## **Device Attachment Rules**

In order for a device to be approved for use on the Provider's network, the device must conform to publicly available industry standards and be non-harmful to Provider's network. Provider does not endorse or provide specific support for any third-party device which the customer may connect to the provider's network.

## **Security**

Provider offers its customers unrestricted access to all of the lawful content, services, and applications available on the Internet. Provider uses industry standard tools and generally accepted best practices and policies to protect our customers from spam, phishing, and other unwanted or harmful online content and activities. In the instances where these tools and policies identify online content as harmful or unwanted, the content may be prevented from reaching customers, or customers may be permitted to identify or inspect content to determine if it is harmful or unwanted.

The security measures employed by Provider to prevent the spread of viruses, malware, spam, harmful and unwanted content or other threats to consumers are intended solely to protect the reliability and safety of our network and do not prevent end-users from running certain applications.

## **Performance Characteristics**

Provider offers broadband Internet access service via a Digital Subscriber Line ("DSL") or Fiber to the Premises ("FTTP") depending on location. DSL is a wireline transmission technology that transmits data faster over traditional copper telephone lines already installed to homes and businesses. FTTP utilizes fiber optic cable to deliver telephone, data and video services. With the capacity for an indefinite amount of data, FTTP technology allows subscribers to receive better quality voice, data and video services in their homes.

The advertised speed of Provider's Internet service is the maximum speed achievable with the technology utilized by Provider. While the maximum advertised speed is attainable for end users, several factors may affect the actual speed of Provider's Internet service offerings, including, but not limited to: the distance of the consumer's home or office from Provider's central office (*i.e.*, the further away the customer is from the central office, the slower the broadband speed), the end user's computer, modem or router, activity during peak usage periods, and other Internet traffic.

Based on internal testing using Ookla Speedtest and other local and remote speed test sites, the expected mean upload and download access speeds are typically the advertised access speed plus or minus 20%.

Provider's internal testing, established a mean round trip latency of 30 ms to local ports.

## **Commercial Terms**

The following paragraphs describe the commercial terms associated with provider' service offerings.

### **Pricing**

In order to meet the usage and budgetary needs of all of our customers, Provider offers a wide selection of broadband Internet access plan options, including promotional offerings, bundled service choices, and ala carte alternatives.

To see Provider's current promotions and pricing on broadband Internet access service, please visit our website [www.hersheytel.net](http://www.hersheytel.net) or call 308-368-5561 to speak with a customer service representative.

### **Early Termination Fees**

If a customer previously entered into a service agreement with Provider for broadband Internet access service for a defined service term, and customer desires to terminate the service agreement prior to the expiration of that term, Provider may charge a reasonable early termination fee if such fee is clearly indicated in the service agreement.

Provider's early termination fee is the monthly service rate at the time of termination times the number of months remaining in the service agreement.

### **Usage-Based Fees**

Provider's Internet service is priced on a flat-fee basis (plus taxes). Provider does not charge end users a usage-based fee for Internet service.

### **Privacy Policy**

The various network management tools and techniques utilized by Provider do not monitor, inspect or store the network activity and traffic of its Internet service users. Further, as part of its network management practices, Provider does not distribute information on network activity and/or traffic to any third party, or use network traffic information for any non-network management purpose.

Provider is required to comply with relevant laws, regulations and other governmental requests.

The Provider's network management practices as discussed herein are intended solely to provide the best online experience possible for all of Provider's customers by safeguarding our network and its users from spam, viruses, phishing, and other unwanted or harmful online content and activities. Provider's network management practices are not intended, nor implemented, to block consumers from accessing the content and applications of their choice, deprive consumers of their entitlement to competition, or discriminate against or in favor of certain network traffic. End users with questions, concerns or complaints regarding Provider's network management practices are encouraged to contact Provider for issue resolution.

### **Contact Us**

If you have any questions regarding Provider's Network Management Practices Policy or would like to file a complaint with Provider regarding its network management practices, please contact Provider at:

Hershey Cooperative Telephone Company  
Attn: Rex Woolley  
P. O. Box 235  
Hershey, NE 69143  
308-368-5561  
308-368-5858  
[rwoolley@hersheytel.net](mailto:rwoolley@hersheytel.net)  
[www.hersheytel.net](http://www.hersheytel.net)

Further, if you believe that Provider is in violation of the FCC's Open Internet Rules, you may file either an informal or formal complaint with the FCC.

<http://esupport.fcc.gov/complaints.htm>

### **Additional Disclaimers**

The Open Internet Rules, as adopted, and Provider's Network Management Practices Policy are not intended to affect, alter or otherwise supersede the legal status of cooperative efforts by broadband Internet access service providers and other service providers that are designed to curtail infringement in response to information provided by rights holders in a manner that is timely, effective, and accommodates the legitimate interests of providers, rights holders, and end users.

Furthermore, the Open Internet Rules, as adopted, and Provider's Network Management Practices Policy do not prohibit Provider from making reasonable efforts to address the transfer of unlawful content or unlawful transfers of content.

For additional information, please review Provider's Acceptable Internet Use Policy/Subscriber Agreement at: [www.connections.net/policy](http://www.connections.net/policy)