Totel Customer Services, Inc

Network TRANSPARENCY Statement

Totel CSI ("Totel CSI" or "Company") provides this Network Transparency Statement in accordance with the FCC's Restore Internet Freedom Rules to ensure that you have sufficient information to make informed choices about the purchase of broadband services. Information about Totel CSI's other policies and practices concerning broadband are available at www.totelcsi.com ("Totel CSI Website").

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

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

A. <u>Totel CSI's Network Transparency Disclosures</u>

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

- 1. Blocking: Totel CSI does not block or discriminate against lawful content.
- 2. Throttling: Totel CSI does not throttle, impair or degrade lawful Internet traffic.
- **3. Affiliated Prioritization:** Totel CSI does not prioritize Internet traffic and has no plans to do so.
- **4. Paid Prioritization:** Totel CSI has never engaged in paid prioritization. We don't prioritize Internet for consideration to benefit particular content, applications, services or devices. Totel CSI does not have plans to enter into paid prioritization deals to create fast lanes.
- 5. **Congestion Management:** Total CSI monitors the connections on its network in the aggregate on a daily basis to determine the rate of utilization. If congestion emerges on the network, Total CSI will take the appropriate measures to relieve congestion.

On Totel CSI'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 Totel CSI's network.

Customers using conduct that abuses or threatens the Totel CSI 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.

Totel CSI'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. Totel CSI's network management practices do not relate to any particular customer's aggregate monthly data usage.

Totel CSI regularly monitors its network to determine utilization on its network. Totel CSI also checks 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, Totel CSI provides notification to the customer via email or phone. If a violation of Totel CSI's policies has occurred and such violation is not remedied, Totel CSI will seek to suspend or terminate that customer's service.

- 6. Application-Specific Behavior: Except as may be provided elsewhere herein, Totel CSI does not currently engage in any application-specific behaviors on its network. Customers may use any lawful applications with Totel CSI.
- 7. **Device Attachment Rules:** Customers must use PPPoE for authentication of point to point connections between devices on the network. There is a limit of one (1) PPPoE session per account. For best results, DSL modems, wireless modems, or other proprietary network gateways used on the Totel CSI broadband network should be provided by Totel CSI. Customers may attach devices of their choosing to their modems, 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 Totel CSI's network or impair the service of other customers. Totel CSI 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 Totel CSI'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:** Totel CSI 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 protections from such threats as spam, viruses, firewall issues, and phishing schemes. Totel CSI 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 35 days.

As its normal practice, Totel CSI does not block any protocols, content or traffic for purposes of network management, but Totel CSI 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

Total CSI deploys Internet access to its subscribers through hardwired broadband access DSL or Fiber.

2. Network Performance

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

For the wireless service, Totel CSI measures Bit Error Rate (BER) and the Received Signal Strength Indicator (RSSI) parameters for transmission rates, latency, and traffic every 15 min. For DSL, Fiber and T1 service, Totel CSI measures traffic every 5 min. All services are best effort.

Totel CSI 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 https://fast.com.

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. At this time, Totel CSI is not offering any non-BIAS data services.

C. Commercial Terms

Pricing and additional service information may be found here.

In addition to this Network Transparency Statement, patrons may also find links to the following on the Totel CSI Website:

- Privacy Policy
- Frequently Asked Questions ("FAQs")
- Acceptable Use Policy

For questions, complaints or requests for additional information, please contact Totel CSI at:

Business Office at **918-535-2208**Email at **totelcsi@totelcsi.com**