

## **NETWORK MANAGEMENT POLICY**

### **Service Offerings**

Winnebago Cooperative Telecom Association and its wholly owned subsidiaries Winnebago Transport Services, Inc., WCTA Wireless, Inc. collectively via the Winnebago Cooperative Telecom Association brand directly offers broadband ISP services in its markets. Please visit the Winnebago Cooperative Telecom Association website to check availability, speed options and pricing.

### **Performance**

Winnebago Cooperative Telecom Association utilizes multiple upstream providers including Aureon and Hurricane Electric. Winnebago Cooperative Telecom Association offers a speed test site to any WCTA broadband customer. The test can be accessed on our website **Speed Test**, or at <http://speedtest.wctatel.net>. These tests are heavily dependent on a customer's home network configuration, modem, and computers, and therefore do not reflect the performance of the Winnebago Cooperative Telecom Association network only.

### **Your Internet Service Speeds**

Winnebago Cooperative Telecom Association provides residential and commercial customers with a variety of high speed Internet plans from which to choose, ranging from our initial tier (with download speeds up to 5 Mbps, and upload speeds up to 1 Mbps to our top tier (with download speeds up to 1 Gbps, and upload speeds to 1 Gbps). Winnebago Cooperative Telecom Association provisions its customers' modems and engineers its network to ensure that its customers can enjoy the speeds to which they subscribe. However, Winnebago Cooperative Telecom Association does not guarantee that a customer will actually achieve those speeds at all times. Without purchasing an expensive, dedicated Internet connection, no Internet Service Provider ("ISP") can guarantee a particular speed at all times to a customer. Winnebago Cooperative Telecom Association advertises its speeds as "up to" a specific level based on the tier of service to which a customer subscribes.

The "actual" speed that a customer will experience while using the Internet depends upon a variety of conditions, many of which are beyond the control of an ISP such as Winnebago Cooperative Telecom Association. These conditions include:

1. Performance of a customer's computer, including its age, processing capability, its 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, wireless connections may be slower than direct connections into a router or modem. Wireless connections also may be subject to greater fluctuations, interference and congestion. Wireless modem connections for use with Winnebago Cooperative Telecom Association's higher speed tiers may not perform at the speeds delivered by these tiers.
3. The distance packets travel (round trip time of packets) between a customer's computer and its final destination on the Internet, 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

connection may traverse the networks of multiple providers before reaching its destination, and the limitations of those networks will most likely affect the overall speed of that Internet connection.

4. Congestion or high usage levels at the website or destination. If a large number of visitors are accessing a site or particular destination at the same time, your connection will be affected if the site or destination does not have sufficient capacity to serve all of the visitors efficiently.
5. Gating of speeds or access by the website or destination. In order to control traffic or performance, many websites limit the speeds at which a visitor can download from their site. Those limitations will carry through to a customer's connection.
6. The performance of the modem you have installed. Modem performance may degrade over time, and certain modems are not capable of handling higher speeds.

This is the reason that Winnebago Cooperative Telecom Association, like all other ISPs, advertises speeds as "up to" a particular level, and does not guarantee them.

There is a speed test available to measure Internet performance. We have provided a link to this site below for your reference. Please note, however, that speed tests have biases and flaws. Speed tests measure limited aspects of an ISP's speed and therefore must be seen as a guide rather than definitive measurements of performance.

**<http://speedtest.wctatel.net>**

### **Latency**

Latency is another measurement of Internet performance. Latency is the time delay in transmitting or receiving packets on a network. Latency is primarily a function of the distance between two points of transmission, but also can be affected by the quality of the network or networks used in transmission. Latency is typically measured in milliseconds, and generally has no significant impact on typical everyday Internet usage. As latency varies based on any number of factors, most importantly the distance between a customer's computer and the ultimate Internet destination (as well as the number and variety of networks your packets cross), it is not possible to provide customers with a single figure that will define latency as part of a user experience.

### **Congestion Management**

Winnebago Cooperative Telecom Association does implement management network techniques in order to minimize congestion. Winnebago Cooperative Telecom Association operates our network to accommodate the necessary traffic requirements. In the event of congestion, all traffic is classified as best effort.

Our congestion management approach will change over time, as we continue to study and enhance our practices and as new technologies emerge. In the meantime, we will continue to invest in our network \

in accordance with our normal course of business operations, which includes installing technology that will increase the speed and capacity of our services.

Such management techniques in place includes:

Monitors bandwidth in and out of WCTA internet network

Upon a bona fide request from end user customer block Peer-to-Peer traffic

### **Content, Applications, Service and Device Providers**

As a full service Internet Service Provider, Winnebago Cooperative Telecom Association delivers a variety of Internet-based applications. These may include but not limited to:

- Internet Access
- Voice over Internet Protocol (VoIP)
- Email

Winnebago Cooperative Telecom Association does not discriminate any customer traffic. Winnebago Cooperative Telecom Association utilizes the network management techniques that are equal and standard across all user applications. We do not modify our network to make our directly served applications perform better than applications a user would access over the general Internet. For example, Winnebago Cooperative Telecom Association does not manipulate our network to perform better for customers accessing Winnebago Cooperative Telecom Association email servers versus Winnebago Cooperative Telecom Association customers accessing Google's Gmail.

The network management practices employed by Winnebago Cooperative Telecom Association do not differ between our directly offered applications to those general applications offered over the Internet.

### **Security Measures**

In the event of Denial of Service (DoS), Distributed Denial of Service (DDoS) attack, spoofing or other malicious traffic, Winnebago Cooperative Telecom Association will implement inbound and outbound filtering on specific hosts. These actions will be performed to ensure reliability and availability of the Winnebago Cooperative Telecom Association Network. These actions will not be utilized for normal Internet applications and traffic.

NOTE: Aureon may perform this action on behalf of Winnebago Cooperative Telecom Association on equipment that is managed by Aureon.

### **Privacy Policy**

Winnebago Cooperative Telecom Association has provided this privacy statement in order to demonstrate our firm commitment to your privacy. The following policy discloses our information gathering and dissemination practices for Winnebago Cooperative Telecom Association.

### **Information**

Winnebago Cooperative Telecom Association is the sole owner of the information collected on its website.

## **Viewer Privacy**

Winnebago Cooperative Telecom Association does not collect personal information such as names, e-mail addresses, postal addresses, or telephone numbers. Since we do not collect any personal information on this Web site, we do not share any personal information with any third parties nor do we use any personal information for any purposes.

## **IP Addresses**

As noted above, we do not collect any personal information on this Web site. We do, however, collect and store information about your Internet connection when you visit our Web site to read or download information, such as reports, news, etc. We use this information to track Web site use, measure site traffic, and improve site navigation and information. We collect information that identifies:

- The name of the domain you access the Internet with.
- The type of web browsing software you use to view our site.
- The date and time of your access.
- The platform you are using (i.e. Windows, Macintosh or Unix).

This information is never sold, given or disclosed to third parties. This information is used internally to administer our web site, provide better services to the public, and provide aggregate traffic statistics to Winnebago Cooperative Telecom Association staff. No personal information is collected.

## **Hyperlinks**

Additionally, this site contains links to other sites. Winnebago Cooperative Telecom Association is not responsible for the privacy practices or the content of such Web sites unless operated directly by Winnebago Cooperative Telecom Association. We encourage you to read the privacy statements of each website that collects personally identifiable information when you leave our website.

## **Acceptance and Jurisdiction**

By using this service, you agree that you have read, understand and will abide, and be bound, by the terms of this Web Site Privacy and Policies ("Terms"). If you do not agree to these Terms, please do not use the Winnebago Cooperative Telecom Association web site. These Terms shall be governed in all respects in accordance with the laws of the State of Iowa without regard to the conflict or choice of law rules thereof. Courts sitting in the State of Iowa, federal and state, shall have exclusive jurisdiction over any dispute arising hereunder.

Winnebago Cooperative Telecom Association reserves the right to change, modify or update this statement at any time without notice.

## **Contacting Winnebago Cooperative Telecom Association**

If you have any questions about this privacy statement, the practices of this site, or your dealings with Winnebago Cooperative Telecom Association, you may contact us at the following:

Winnebago Cooperative Telecom Association  
704 East Main Street  
Lake Mills, Iowa 50450  
Phone: 641-592-6105  
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