

# Network Management Policy

Polar Communications ("We", "Our", "Us") provides this Network Management Policy ("Policy") in accordance with Federal Communications Commission ("FCC") requirements to disclose certain network management practices, performance characteristics, and commercial terms. Additional information about our broadband policies and practices is available at <u>https://polarcomm.com/legal/</u> ("Website").

## **Network Practices**

We engage in network management practices that are tailored and appropriate for achieving optimization on our network considering the particular network architecture and technology of our broadband Internet access service. Our goal is to ensure that all our customers experience a safe and secure broadband Internet environment that is fast, reliable, and affordable. We want our customers to experience all the Internet offers, whether it is social networking, streaming videos, listening to music, or communicating through email and videoconferencing.

Our network practices include congestion- and security-protocolmanagement. Such protocols and practices generally will not impact our customers' user experience. We use various tools and industry-standard techniques to manage our network to ensure fast, secure, and reliable Internet service.

1. Blocking: We do not block or discriminate against lawful Internet content, applications, services, or non-harmful devices. We conduct only reasonable network management.

2. Throttling: We do not throttle, impair, or degrade lawful Internet traffic based on content, application, service, user, or use of a non-harmful device. We engage in only reasonable network management practices.

3. Affiliated Prioritization: We do not favor any Internet traffic over others, including through the use of techniques such as traffic shaping, prioritization, or resource reservation, to benefit an affiliate, and we have no plans to do so.

4. Paid Prioritization: We do not favor or prioritize any Internet traffic over others, and we do not prioritize Internet websites over others in exchange for any consideration to benefit any content, applications, services, or devices.

## **Network Management Practices**

Our network management practices are intended to ensure that we provide our customers with the best possible Internet access. To achieve this goal, we employ network management techniques such as identifying spam and preventing its delivery to customer email accounts, detecting malicious Internet traffic, and preventing the distribution of, or inadvertent access to, malware, phishing, viruses, or other harmful code or content.

1. Congestion Management

We monitor the connections on our network in the aggregate for all types of traffic to determine the utilization rate. We may take appropriate measures to relieve undue congestion if it occurs on the network. Our network and congestion management practices do not discriminate based on the type of application being used, nor are they based on any particular customer's aggregate monthly data usage. We examine only current network conditions, not our customers' online activities.

Customer conduct that abuses or threatens our network or violates our Acceptable Use Policy or Internet Service Agreement will be asked to stop immediately. If a customer fails to respond or cease such conduct, we may suspend service or terminate the user's account.

We also 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, we provide notification to the customer via email or phone. If a customer violates the Acceptable Use Policy or other policies and such a violation is not remedied, we will seek to suspend or terminate that customer's service.

If we take any congestion management actions, the vast majority of our customers' Internet activities will be unaffected. Some customers may, however, experience more extended download or upload times or slower surf speeds.

2. Application-Specific Behavior

Except as may be provided elsewhere herein, we do not engage in any application-specific network management activities on our network. Customers may use any lawful application as part of their Internet usage.

3. Device Attachment Rules

3

For best results, modems, wireless modems, or other proprietary network gateways used on our broadband network should be provided by us. Customers may, however, attach their own devices to their modems, including wired or wireless routers, laptops, desktop computers, video game systems, televisions, or other network-enabled electronics equipment. Customers are responsible for ensuring that their equipment does not harm our network or impair other customers' service. We are not responsible for the functionality or compatibility of any equipment provided by our customers. Customers are responsible for securing their own equipment to prevent third parties from unauthorized access to our broadband network and will be held responsible for the actions of such third parties who gain unauthorized access through unsecured customer equipment. If we discover a customer device is harmful to our network, we have the right to request that the customer remove such device.

#### 4. Security

We know the importance of securing our network and customers from network threats and annoyances. We promote the security of our network and our customers by protecting them from threats like spam, viruses, firewall issues, and phishing schemes.

We also deploy spam filters for our email service 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 spam files through the email program. Spam files are automatically deleted if not accessed within 30 days.

4

As normal practice, we do not block protocols, content, or traffic for network management, but we may block or limit traffic such as spam, viruses, malware, or denial-of-service attacks to protect network integrity and the security of our customers.

These tools and practices may change from time to time to keep up with changing network technologies and new and innovative ways our customers use the network.

# Performance Characteristics

1. Service Description

We offer broadband service over Fiber-to-the-Home (FTTH). Information about our different service offerings can be found at <u>https://polarcomm.com/</u>. All of our broadband services can support realtime applications.

2. Network Performance

We provide our customers' modems and engineer our network to ensure that our customers can enjoy the speeds to which they subscribe. However, we do not guarantee that a customer will actually achieve those speeds at all times. We advertise our 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 our control. These conditions include but are not limited to i) performance of a customer's broadband device, including its age, processing capability, its operating system, the number of applications running simultaneously, and the presence of any adware and viruses; ii) 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. iii) the distance packets travel (round trip time of packets) between a customer's computer and its final destination on the Internet; iv) Congestion or high usage levels at the website or destination; and v) gating of speeds or access by the website or destination deployed by the site owners to manage traffic or performance.

Customers can test their actual speeds using the speed test found on our website or by going to: <u>http://polarcomm.speedtestcustom.com/</u>

Additionally, there are publicly available speed tests that measure Internet performance. All speed tests have biases and flaws and each of these tests measure limited aspects of an ISP's speed and therefore must be seen as a guide rather than definitive measurements of performance.

### http://netalyzr.icsi.berkeley.edu

In addition, the following tables show our internal testing results.

Speed Tier	Technology	Advertised	Actual	Latency
(Download/Upload		Download/Upload	Download/Upload	(ms)
Speeds in Mbps)		Speed (Mbps)	Speed (Mbps)	
250	FTTH	250/250	252/255	5
500	FTTH	500/500	502/495	4
1000	FTTH	1000/1000	925/903	4
5000	FTTH	5000/5000	5332/5152	2

#### **Residential Speeds**

## **Business Speeds**

Speed Tier	Technology	Advertised	Actual	Latency
(Download/Upload		Download/Upload	Download/Upload	(ms)
Speeds in Mbps)		Speed (Mbps)	Speed (Mbps)	
250	FTTH	250/250	252/255	5
500	FTTH	500/500	502/495	4
1000	FTTH	1000/1000	925/903	4
5000	FTTH	5000/5000	5332/5152	2

3. Impact of Non-BIAS Data Services

The FCC defines 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, we are not offering any non-BIAS data services.

## **Commercial Terms**

1. Pricing

We offer multiple levels of internet service, all with no monthly data cap. Enterprise customers may require services that are custom tailored to a specific project and individually priced based on the needs and criteria established by the enterprise customer and if so, those services may be governed by other use policies and agreements specific to that enterprise user. Our pricing for our different service offerings and other terms can be found at <u>https://polarcomm.com/resources-support/</u>. Prices do not include applicable federal, state, or local taxes and regulatory fees. Prices and packages are subject to change.

## 2. Privacy Policies

We value the privacy of our internet service customers. Like most companies, we collect certain information about our customers and use it to provide our services. We collect information when our customers interact with us, when our customers use our internet service, and when our customers visit our website. This information is used to deliver, provide, and repair our services and establish and maintain customer records and billing accounts. We protect the information we have about our customers and require those we share it with to protect it. We do not sell, license, or share information that individually identifies our customers with others without your consent, except as necessary when working with vendors and partners for business purposes and when necessary for them to do work on our behalf. Additional details about our Privacy Policy can be found at <a href="https://polarcomm.com/legal/">https://polarcomm.com/legal/</a>.

3. Redress Options

We strive to provide excellent customer service and resolve any issues promptly. If you have questions, complaints, or requests for additional information, please call 701-284-7221 or email us at <u>internet@polartel.com</u>. We take all such questions and complaints seriously.

In addition to this Policy, customers may also find links to the following on our Website:

- <u>Acceptable Use Policy</u>
- Broadband Labels (Machine-Readable Format)