

**Pinpoint Communications, Inc.**  
**Cambridge Telephone Co.**  
**Pinpoint Wireless, Inc.**  
**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 Pinpoint Communications, Inc., Cambridge Telephone Co. and Pinpoint Wireless, Inc. (collectively, "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**

It is possible that a relatively small number of customers may place a disproportionate demand on the network bandwidth resources, causing network congestion and an overall degradation in service quality for other end users. For this reason, if Provider's network nears a state of congestion, Provider will use congestion management practices to ensure all of Provider's customers retain access to a "fair share" of bandwidth resources.

When Provider's network nears a state of congestion, the congestion management tools, practices and/or software employed by Provider will identify segments of the Provider network which have a predetermined, aggregated level of bandwidth usage. From there, the congestion management tools will ascertain which customer account in the identified network segment is using a disproportionate share of the bandwidth. The Internet traffic of the identified customer account may be temporarily managed until the period of network congestion passes. Customers whose Internet traffic is temporarily managed by Provider will still be able to do anything they want online, and many activities will be unaffected; however, these customers may experience slower downloads and uploads and Internet/website response times.

The congestion management practices utilized by Provider are "protocol-agnostic" meaning that the network does not manage congestion based on the

online activities, protocols or applications a customer uses. Rather, Provider's congestion management practices focus only on the heaviest bandwidth users in real time.

The specific congestion management practices used by the Provider are rate limit Internet Control Message Protocol ("ICMP") at Internet Tier One connections along with the customer's data limitations rated by the information rate purchased by the customer. The traffic subject to these practices is the ICMP on the wholesale side and the bandwidth over CIR for the end-user. These practices maintain connectivity to all of the customers and there are no adverse effects known to the end user in relation to these practices.

### **Application-Specific Behavior**

Provider utilizes the following application-specific network management practices:

- ICMP rate limits to past Denial of Service ("DOS") ports/addresses
- Provider keeps a current access control list of all known vulnerabilities

### **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. Any device that the customer currently has can be tested for compatibility with 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.

Provider currently carries DOS filters on their CORE Tier One Edge Routers for their Wholesale customers. Security measures to prevent the spread of viruses, malware, spam or other threats are prevented by an outgoing SPAM and Relay filtering server.

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

## Performance Characteristics

Provider offers broadband Internet access service via a Digital Subscriber Line (“DSL”). DSL is a wireline transmission technology that transmits data faster over traditional copper telephone and fiber to the premise lines already installed to homes and businesses.

Provider’s internal DSL testing provides the upload/download speeds and mean latency speeds as indicated in the table below:

		test #1	test #2	test #3	
<b>Cambridge/Bartley</b>		<b>Speed Up/Down</b>	<b>Speed Up/Down</b>	<b>Speed Up/Down</b>	<b>Latency</b>
\$29.95	384kb/768kb	.49/.80 Mbps	.62/.79 Mbps	.60/.78 Mbps	3, 2, 6(ms)
\$39.95	1M/2M	1.00/1.92 Mbps	1.02/1.93 Mbps	1.00/1.95 Mbps	1, 4, 2(ms)
\$49.95	2M/4M	2.06/4.49 Mbps	1.96/4.18 Mbps	2.06/4.09 Mbps	6,2, 2(ms)
\$59.95	3M/6M	3.14/6.03Mbps	3.10/5.95 Mbps	3.12/5.86Mbps	2,3,2(ms)
\$69.95	5M/10M	4.93/9.27Mbps	4.90/9.25Mbps	5.19/9.51Mbps	2,4,3(ms)
\$129.95	5M/50M	4.99/53.81Mbps	4.97/49.61Mbps	5.25/46.62Mbps	1,4,4(ms)
<b>McCook/Oxford</b>					
\$24.95	Up to 768Kb	0.32/0.67Mbps	0.32/0.69Mbps	0.31/0.67 Mbps	45,45,44(ms)
\$29.95	Up to 1 M	0.43/0.90Mbps	0.43/0.90Mbps	0.43/0.89Mbps	44,43,43(ms)
\$34.95	Up to 1.5 M	0.64/1.34Mbps	0.65/1.33Mbps	0.64/1.34Mbps	46,47,47(ms)
\$39.95	Up to 2 M	0.86/1.80Mbps	0.85/1.79Mbps	0.86/1.77Mbps	46,46,46(ms)
\$79.95	Adaptive	0.82/9.18Mbps	0.86/9.17Mbps	0.86/9.11Mbps	21,21,21(ms)

Provider offers broadband Internet access via cable modem. Broadband Internet access service delivered via a cable modem uses the existing cable television infrastructure (coaxial cable) for bi-directional data communication and transmission.

Provider’s internal cable modem testing provides the upload/download speeds and mean latency speeds as indicated in the table below:

		test #1	test #2	test #3	
<b>Indianola Cable Modem</b>		<b>Speed Up/Down</b>	<b>Speed Up/Down</b>	<b>Speed Up/Down</b>	<b>Latency</b>
\$34.95	512Kb	0.22/0.46 Mbps	0.23/0.46Mbps	0.24/0.46Mbps	60,38, 78 (ms)
\$64.95	1024Kb	0.48/1.00 Mbps	0.49/0.99Mbps	0.49/0.99Mbps	11, 12,11(ms)
	5056Kb	0.96/4.85 Mbps	0.97/4.84Mbps	0.97/4.84 Mbps	10,12,11(ms)

Provider offers broadband Internet access service via WiMAX. WiMAX is a wireless technology with the opportunity to provide symmetrical broadband services to end consumers.

Provider's internal WiMax testing provides the upload/download speeds and mean latency speeds as indicated in the table below:

		test #1	test #2	test #3	
WiMax		Speed Up/Down	Speed Up/Down	Speed Up/Down	Latency
\$49.95		1.20/4.11Mbps	0.87/4.13Mbps	0.79/4.09	NA*, 37,39 (ms)

Provider offers broadband Internet access service via Mobile 3G wireless services. Mobile 3G wireless via UMTS technology which provides asymmetrical broadband services end consumers.

Provider's internal Mobile 3G wireless testing provides the upload/download speeds and mean latency speeds as indicated in the table below:

		test #1	test #2	test #3	
Blaze Wireless 3G		Speed Up/Down	Speed Up/Down	Speed Up/Down	Latency
	up to 2M	1.31/2.21Mbps	1.83/1.84Mbps	1.61/1.39Mbps	86ms, 105ms, 120ms

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.

The actual speeds achieved with Provider's Internet service offering make Provider's Internet service suitable for real-time applications, such as Voice over Internet Protocol ("VoIP").

Provider does not offer any specialized services.

## Commercial Terms

### 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 <http://www.pnpt.com/internet.asp> or call 800-793-2788 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 \$250.00. (Indianola service agreements only)

### **Usage-Based Fees**

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

Included in Provider's wireless data monthly Internet service offering is a monthly data consumption of 5 or 20 Megabytes (MB) off-network usage. Internet usage in excess of this amount will result in the end user being charged an additional fee. The usage fee schedule is available on Provider's website at [www.pnpt.com](http://www.pnpt.com).

For additional information on Provider's fee schedule for 3G Internet services visit the Provider's website at: [www.blazewireless.com](http://www.blazewireless.com).

### **Privacy Policy**

Provider affords full access to all lawful content, services and applications available on the Internet and does not routinely monitor, inspect or store the network activity and traffic of its Internet service users. However, Provider reserves the right to monitor bandwidth, usage, transmissions and content for purposes of protecting the integrity of the network and Provider's Internet access service through reasonable network management practices.

Provider may collect equipment information to identify the equipment customer is using on the network, including, but not limited to: equipment type, serial number, settings, configuration and software. Provider may also collect performance information to examine the operation of the equipment, services and applications the customer may use on the network, including, but not limited to: IP addresses, URLs, data transmission rates and latencies, location information, security characteristics, and information about the amount of bandwidth and other network resources customer is using in connections with uploading, downloading or streaming data to and from the Internet.

Network traffic, activity, performance information, and equipment information monitored or collected by Provider is done so for the sole purpose of reasonable network management purposes.

Provider is required to comply with all relevant laws, regulations and governmental requests. Information covered under this Privacy Policy, as well as other categories of information, may be disclosed to third parties if Provider determines, in its sole discretion, that such a disclosure is necessary or required. Provider may also disclose this information if, in its sole discretion, such a disclosure is necessary or required to protect our interests or the interests of our customers. Provider may also disclose this information in connection with the sale of our business.

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:

Pinpoint Communications  
Attn: Tom Shoemaker  
PO Box 490  
611 Patterson St.  
Cambridge, NE 69022  
800-793-2788  
308-697-3631  
[info@pnpt.com](mailto:info@pnpt.com)  
[www.pnpt.com](http://www.pnpt.com)

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.pnpt.com](http://www.pnpt.com)