

**RONAN TELEPHONE COMPANY
BROADBAND PROVIDER DISCLOSURES**

November 20, 2011

Ronan Telephone Company (RTC) provides fixed wireline broadband services over Digital Subscriber Line (DSL) and fiber platforms to its end users. It is the intent of our company to meet the requirements of the FCC's Order to maintain an "Open Internet" by meeting obligations of transparency, no blocking of lawful content and no unreasonable discrimination in the transmission of lawful network traffic over our network.

RTC continues to have obligations and the authorization to address the needs of emergency communications or law enforcement, public safety or national security authorities, consistent with or as permitted by applicable law. These policies do not prohibit reasonable efforts by RTC to address copyright infringement or other unlawful activity that may occur on our network.

RTC NETWORK MANAGEMENT PRACTICES

RTC allows the free flow of lawful content by providing adequate capacity within its capabilities to meet broadband requirements of its customers.

Congestion Management:

RTC manages congestion in its own network by maintaining adequate bandwidth to the interconnecting point with upstream providers. When RTC's network reaches a high percentage of capacity in use on a consistent basis, we begin planning for expanding bandwidth upstream. RTC's end user network lies within the boundaries of the local exchanges of Ronan and Pablo, Montana. A map of RTC's bandwidth transport facility route beyond its local exchanges can be viewed at the Company's business office.

RTC equipment in place may, from time to time, disrupt the flow of packets if the amount of traffic at a specific customer's home or business threatens to cause a loss of value of service to other consumers of RTC broadband services.

At times, congestion can affect the overall quality of service to all of RTC's end users. When congestion is caused by events other than normal anticipated use, ie a computer virus which attacks the network, an investigation is immediately conducted to find the root cause of congestion. If congestion is caused by an end user's computer with a virus, RTC staff will attempt to contact the user who is expected to address the problem quickly. If the end user cannot be contacted, RTC reserves the right to shut down the service until the cause is eliminated.

To avoid congestion on our email servers, either incoming or outgoing, RTC limits the sending of emails where the combined size of the email, its headers and attachments exceed 10Mb.

RTC maintains logs of network activity to study traffic patterns and potential congestion issues. Congestion beyond RTC's network is managed by other Tier 1 and Tier 2 bandwidth service providers.

Application-Specific Behavior:

RTC broadband services over Digital Subscriber Line (DSL) protocol are generally provided using an IP NAT process which maximizes the efficiency of the use of IP addresses across the network. Public IP addresses are available upon request to meet the needs for specific applications which perform better under a Public IP structure, such as gaming, Xbox, VPN's, etc.

RTC utilizes rate limiting to control the rate of email sent on our outgoing (SMTP) mail server by any one username to 150 recipients within a 5-minute period. Should a username exceed either of these limits their ability to send email is restricted for 6 hours after the limit is reached. The customer may call in to request removal from the rate limiter. The customer may wait 5 minutes between large recipient group emails to avoid restriction.

To avoid spam related email relaying, RTC's server restricts outbound traffic to other email servers on Port 25. Any outbound email through this port must be sent utilizing RTC's SMTP mail server. Some end users with mail servers on their internal networks may use this port by special arrangement.

Device Attachment Rules:

RTC places no restrictions at this time on the types of devices that can connect to the network as long as those devices do not cause a network failure. If a device requires remote access capabilities, a public IP is required.

Security:

RTC uses a filter to detect potentially harmful activities such as virus propagation and harmful spam generating activities via email. End users have access to filtered emails via the website: <https://mail.accessmontana.com/webmail/src/login.php>. A user name and password are required to access the spam filter of individual end user accounts. This site allows end users to manage their own email and anti-spam settings as well as their filtered and undelivered email messages.

RTC maintains logs of network activity which may be subpoenaed as a source of information invoked under CALEA or other actions of Federal, State or local judicial courts.

PERFORMANCE CHARACTERISTICS

Service Descriptions:

Digital Subscriber Loop (DSL)

RTC provides broadband services over copper facility using DSL equipment. Our DSL levels of service range from 512K download/128K upload to 8Mb download/1 Mb upload.

The quality and speeds of DSL service levels are dependent on the distance the customer is from the nearest host or remote central office that houses DSL equipment.

DSL service is available within 18,000 feet of a remote office. The level of service RTC is able to provide is also dependent on several factors including the condition of the copper pairs serving the end user and the end user's equipment and wiring.

We offer VDSL service with symmetrical ranges from 4Mb to 8Mb; the service can be offered within a 5,000 foot range of the host or remote when facilities and line conditioning are favorable.

Speeds and latency are affected by a number of factors. A speed test to evaluate the download and upload speeds as well as a latency measurement of the bandwidth provided to our customer over RTC's equipment is available at <http://speed.ronan.net>.

Speeds and latency may be affected beyond our network by events and equipment which run the World Wide Web. Speed tests on the World Wide Web are indicative of capacity of the web as a whole, not specifically to the RTC-provided service. One such test is available at <http://www.speakeasy.net>.

Services are offered and provided to the largest bandwidth potential under best possible effort. Some conditions and technical limitations of DSL may restrict full delivery of bandwidth at all times and service is offered with best effort.

Fiber to the Premise

Broadband over fiber to the premise is provided in some locations within the service area. The bandwidth capacity RTC offers over fiber ranges from 3 Mb to 100 Mb at this time.

Impact of Specialized Services:

Specialized services which share bandwidth capacity may affect a customer's service. Examples of such specialized services are Voice over Internet Protocol (VoIP) and Internet Protocol Television (IPTV). Some prioritization of bandwidth allocation is possible but some packet loss may be unavoidable.

COMMERCIAL TERMS

<u>DSL Rates</u>	<u>Residential</u>	<u>Business</u>	<u>Install Charge*</u>
Velocity 1 512k/128k	\$19.95		\$50
Velocity 2 1.5Mb/512k	\$29.95	\$34.95	\$50
Velocity 3 4Mb/1Mb	\$49.95	\$59.95	\$50
Velocity 4 8Mb/1Mb	\$59.95	\$69.95	\$50
Data Only 1.5 Mb/512k	\$44.95	\$44.95	\$50
Data Only 4 Mb/1Mb	\$69.95	\$69.95	\$50
Data Only 8 Mb/1Mb	\$79.95	\$79.95	\$50
Modem Rental	\$2.99	\$2.99	
Public IP**	\$5	\$15	

Two filters are provided; additional filters are \$5 per filter.

*We charge a one-time installation charge on the initial installation and subsequent moves to different locations within our service area. Reconfiguration of service speeds are billed a one-time fee of \$15.

**Two private IP addresses are available upon request at no additional charge

<u>VDSL Rates</u>	<u>Residential</u>	<u>Business</u>	<u>Install Charge*</u>
4Mb Symmetrical	\$320	\$320	\$50
6Mb Symmetrical	\$480	\$480	\$50
8Mb Symmetrical	\$640	\$640	\$50
Modem Rental	\$8.99	\$8.99	
Or Purchase Price	\$200	\$200	
One-time Installation Fee	\$50	\$50	

Discounted rates or charges may apply during certain promotional periods.

<u>Fiber to the Premise (FTTP)* Rates</u>	<u>Business</u>	<u>Install Charge**</u>
1Mb	\$450	\$450
2Mb	\$400	\$400
3Mb	\$675	\$675
4Mb	\$850	\$850
5Mb	\$1,000	\$1,000
6Mb	\$1,150	\$1,150
7Mb	\$1,250	\$1,250
8Mb	\$1,350	\$1,350
9Mb	\$1,425	\$1,425
10Mb	\$1,500	\$1,500

*FTTP Service is offered where facilities are available.

**We charge a one-time installation charge on the initial installation and subsequent moves to different locations within our service area. Reconfiguration of service speeds are billed a one-time fee of \$200.

Discounted rates or charges may apply during certain promotional periods.

Privacy Policy:

RTC and its employees fully comply with the Secrecy in Communications Act, requirements of Customer Proprietary Network Information (CPNI) Act and the Red Flag Rules.

RTC maintains logs of network activity to help reasonably manage and maintain our network.

These logs may be subpoenaed as a source of information invoked under CALEA or other actions of Federal, State or local judicial courts and are released only under these circumstances.

New and existing customers of RTC broadband services may view this disclosure at <http://www.ronan.net/net.pdf>.

CUSTOMER RECOURSE

Customers who have questions or concerns about RTC's network management policies or customer service issues are encouraged to contact our staff or management for information or resolution.

Our company's business location, contact information and hours open to the public are as follows:

Ronan Telephone Co.

Internet Office

300 Main Street SW

Ronan, MT 59864

406-676-2777, Toll Free 1-877-205-6252

support@ronan.net

Open Hours: 8 am – 5 pm Monday – Friday, 10 am – 4 pm on Saturday

Business Office

312 Main Street SW

Ronan, MT 59864

406-676-2751, Toll Free 1-877-205-6252

rtc@ronan.net

Open Hours: 8 am – 5 pm Monday-Friday

BLOCKING

RTC practices reasonable network management. RTC does not and will not block any lawful content, application, service or non-harmful device as long as it does not unduly conflict with reasonable network management.

NO UNREASONABLE DISCRIMINATION

RTC does not unreasonably discriminate in transmitting lawful network traffic. RTC's traffic is not prioritized over another carrier's traffic on our network.

Definitions

Fixed broadband Internet access service: Serves end users primarily at fixed endpoints, using stationary equipment. This includes fixed wireless services (including fixed unlicensed wireless services) and fixed satellite services.

Mobile broadband Internet access service: A service that serves end users primarily using mobile stations.

Reasonable network management: A reasonable network management practice is if it is appropriate and tailored to achieve a legitimate network management purpose, taking into account the particular network architecture and technology of the broadband Internet access service.