

**Winn Communications Co.**  
**Network Management Practices Policy Disclosure**

*Effective November 20, 2011*

Pursuant to the Federal Communications Commission's regulations in Part 8 of Title 47 of the Code of Federal Regulations, Winn Communications Co. ("Winn Communications") hereby states its Network Management Practice Policy regarding its network practices, performance characteristics, and commercial terms to its current and prospective customers, third-party content providers, and other interested parties. The intent of this Network Management Practice Policy Disclosure is to enable the public to make informed choices regarding the broadband Internet access services offered by Winn Communications, its parent, affiliate, and subsidiary companies, and how such practices may affect those services. Winn Communications may revise its Network Management Practices Policy from time to time.

**Network Management Practices**

Winn Communications utilizes reasonable and responsible network management practices that are consistent with industry standards, and that are tailored to achieve legitimate network management purposes. Because Winn Communications has limited bandwidth, it reasonably manages its network to facilitate Internet usage by all of its customers. Winn Communications uses reasonable and responsible network management practices in an effort to prevent spam, viruses, security attacks, network congestion and other risks that threaten to degrade service.

**Congestion Management**

Winn Communications constantly monitors its network to manage congestion avoid over utilization of circuits.

**Application-Specific Behavior**

Winn Communications does not make use of any application-specific network management practices. Winn Communications does not favor, modify, inhibit, rate control or block any specific protocols, protocol ports or fields, or any applications or classes of applications.

## **Device Attachment Rules**

Only devices that conform to publicly-available industry standards, and that are not harmful to Winn Communications' network, are approved for use. Winn Communications reserves the right to disable devices that cause disruptions to Winn Communications customers or that are not in compliance with industry standards. In the event that Winn Communications disables a device or denies access to application providers, prompt notice will be given of the decision to deny access to the network or disable a device.

## **Security**

Winn Communications provides customers with unrestricted access to all of the lawful content, services, and applications available on the Internet. Winn Communications uses industry standard tools and utilizes best practices and policies to protect customers from spam, phishing, and other unwanted or harmful online content. When Winn Communications identifies harmful or unwanted online content, it may prevent delivery of such content to customers, or customers may be permitted to identify or inspect content to determine if it is harmful or unwanted. Winn Communications' security methods are not intended to prevent end-users from running any specific applications.

## **Performance Characteristics**

### **Service Description**

Winn Communications offers broadband Internet access service via the following methods:

- Digital Subscriber Line (DSL) (which provides high-speed data transmission over copper telephone lines);
- Broadband (which provides high-speed data transmission over fiber optic cable);
- Satellite Internet (which provides high-speed data transmission via satellite); and

- Wireless Technology (which provides high-speed data transmission using fixed wireless antennae).

The following provides mean upload and download speeds during peak usage periods (*i.e.*, between 7:00 p.m. and 11:00 p.m. on weeknights) are:

Technology:	Mean Download/Upload Speed:	Latency:
DSL	Up to 5 Mbps/Up to 8 Mbps	50 ms
Broadband	Up to 50 Mbps/Up to 1 Gbps	12 ms
Satellite	Up to 5 Mbps/Up to 1.5 Mbps	25 ms
Wireless	Up to 5 Mbps/Up to 2.5 Mbps	100 ms

Several factors may affect the actual speed, including, but not limited to, the customer's distance from the central office, the customer's computer and activity during peak usage periods. Actual speed depends also on the customer's service tier.

## **Commercial Terms**

### **Pricing**

In order to meet the usage and budgetary needs of all of our customers, Winn Communications offers a wide selection of Internet access plan options, including promotional offerings, bundled service choices, and a la carte alternatives.

To find out about Winn Communications pricing on Internet service, visit our website at: <http://www.winncommunications.net>, or call 1-866-820-3266

### **Usage-Based Fees**

Winn Communications Internet service is priced on a flat-fee basis (plus taxes). Winn Communications does not charge end users a usage-based fee for Internet service, with the exception of dial up service in excess of 320 hours per month.

### **Privacy Policy**

Winn Communications reserves the right to monitor usage rates, bandwidth, transmissions and content in order to protect the operation of the network through reasonable network management practices discussed above. Winn Communications affords full access to 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.

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

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

The Winn Communications Network Management Practices Policy is designed to safeguard our network and its users from spam, viruses, phishing, and other unwanted or harmful on-line content, with the intention of providing the best Internet experience possible for our customers. Winn Communications 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.

Winn Communications is required to comply with relevant state and federal laws, regulations and judicial orders. Information may be disclosed to third parties if Winn Communications determines, in its sole discretion that such a disclosure is necessary to protect our interest or the interests of our customer, or is required to comply with legal requirements or orders. This information may also be disclosed in connection with the sale of our business.

### **Redress Options**

If you have any questions regarding Winn Communications Network Management Practices Policy or would like to file a complaint regarding its network management practices, please contact us at:

Winn Communications  
402 N. Mission Street  
Mt. Pleasant, MI 48858  
1-866-820-3266  
<http://www.winncommunications.net>

If you believe that Winn Communications is violating the FCC's Open Internet Rules, you may file a complaint with the FCC. <http://esupport.fcc.gov/complaints.htm>

### **Additional Disclaimers**

The Open Internet Rules, as adopted, and Winn Communications Network Management Practices Policy are not intended to affect, alter or otherwise supersede the legal status of cooperative efforts by 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 Winn Communications Network Management Practices Policy do not prohibit Winn Communications from making reasonable efforts to address the transfer of unlawful content or unlawful transfers of content.