

**Internet Disclosure**

**Network Practices**



## **Congestion Management Policy**

**Telephone Associates monitors and proactively reinforces our network with additional capacity in areas where growth trends identify a need. If network congestion occurs, we employ various techniques to ensure a positive customer experience and fair distribution of network resources.**

**Telephone Associates is committed to providing its customers with the best online experience. We follow industry leading network security standards to ensure the integrity and availability of our broadband network and the confidentiality of our customer's proprietary information. We view network management as critical to the services we provide to our customers. Managing our network well is one of the most important parts of our business. It ensures our customers have access to the content and applications that they enjoy.**

**Based on our experience, Telephone Associates customers may encounter congestion during peak times (7:00 pm and 11:30 pm). During those times, the majority of residential customers are attempting to use the Internet simultaneously, which increases the potential for congestion.**

**When congestion takes place, our network management uses various techniques to create a good customer experience. These include preventing virus/spam delivery to customer email accounts. We also reinforce our network with additional network capacity in areas where congestion is identified as part of standard network engineering design plans. It may be relevant to limit the number of customers that may be served on a particular network node until additional capacity can be added. We also seek to ensure that our customers are not excessively using the service. In some instances, we may contact customers with excessive usage as a factor.**

## **Application-Specific Policy**

**Telephone Associates High-Speed Internet customers receive full access to all of the lawful content, services, and applications that the Internet has to offer. Telephone Associates does not block, prioritize, or degrade any Internet sourced or destined traffic based upon application, source, destination, protocol, or port unless it does so in connection with a security practice described in the Security Policy section below.**

## **Device Attachment Policy**

**Customers have the flexibility of attaching any modem of their choice to their Telephone Associates High-Speed Internet service provided that the modem supports the technology on which the customer is provisioned. Telephone Associates will not support any modem related**

issues for the customers that attach a non-certified modem. Supported modems include those that are certified for use on our network including specific makes, models, and firmware revisions.

Telephone Associates may attach devices of their choice to the modem they select.

## **Security Policy**

Telephone Associates is dedicated to managing its network to ensure that all customers receive the most secure online experience. We use industry-leading security practices to manage our network, provide services to our customers, and ensure compliance with our company policies. These tools and practices may change from time to time to keep up with the new and innovative ways that customers use the network and to keep up with the changing network technologies.

When malicious behavior is identified, Telephone Associates employs various techniques to ensure a positive customer experience. Our security management techniques include ensuring that customer systems are not propagating viruses, or distributing spam email, or engaging in other malicious behavior. We use industry best practices to prevent virus/spam delivery to customer email accounts. We automatically detect and mitigate (Denial of Service) DOS attacks for our customers. We block malicious sites and phishing sites to prevent fraud against our customers and to prevent our customers from getting infected via (Domain Name Service) DNS black-holing and Internet Protocol address (IP) black-holing.

Specific security practices deployed by Telephone Associates may include by are not limited to :

### **IP Spoofing Prevention**

The basic protocol for sending data over the Internet network and many other computer networks is Internet Protocol (IP). The header of each IP packet contains, among other things, the numerical source and destination address of the packet. The source address is normally the address that the packet was sent from. By forging the header so it contains a different address, an attacker can make it appear that the packet was sent by a different machine. The machine that receives spoofed packets will send a response back to the forged source address, which means that this technique is mainly used when the attacker does not care about the response or the attacker has some way of guessing the response.

Telephone Associates applies security measures to prevent an attacker within the network from launching IP spoofing attacks against these machines and flooding the network with unwanted data that can cause congestion.

### **DoS/Distributed DoS Monitoring and Mitigation**

A denial-of-service attack (DoS attack) or distributed denial-of-service attack (DDoS attack) is an attempt to make a computer resource unavailable to its intended users. Although the means to

carry out, motives for, and targets of a DoS attack may vary, it generally consists of the concerted efforts of a person, or multiple people to prevent an Internet site or service from functioning efficiently or at all, temporarily or indefinitely.

Telephone Associates applies security measures to prevent an attacker within the network from launching DoS or DDoS to ensure that customers can access the Internet when needed.

## Port 25 Blocking

Telephone Associates filters port 25 to reduce the spread of email viruses and spam (unsolicited email). Filtering port 25 has become the industry best practice to reduce the spread of email viruses and spam. These email viruses allow malicious software to control infected computers. These viruses direct the infected machines to send email viruses and spam through port 25. Port 25 filtering is a recognized Internet industry best practice for service providers like Telephone Associates to filter email traffic. The Messaging Anti-Abuse Working Group (MAAWG), a global organization focused on preserving electronic messaging from online exploits and abuse with the goal of enhancing user trust and confidence, recommends that "providers block incoming traffic to your network from port 25."

Read more about MAAWG Port 25 filtering best practices.

[http://www.maawg.org/sites/maawg/files/news/MAAWG\\_Port25rec0511.pdf](http://www.maawg.org/sites/maawg/files/news/MAAWG_Port25rec0511.pdf)

Telephone Associates may block connections on other ports that are commonly used to exploit other customers or non-customer computers.

Telephone Associates may block sites that are used in a malicious manner to infect customers, perform fraud against them and otherwise as needed to protect our network and our customers.

## Performance Characteristics

### Expected Performance

When you order Telephone Associates High-Speed Internet access service, the service we will quote to you is based on the connection speeds that are available at your address. We are continually upgrading our network, but our quoted speed is based on the characteristics of the relevant network facilities at the time you order.

The actual speed you experience will vary. During most periods, you can generally expect actual delivered speed ranging from 80% to 100% of the advertised speed purchased. This speed is measured based on the service provided between the outside network interface device and the first equipment where the line connects to you. The percentage will vary depending on the amount of bandwidth our network uses in delivering service to you, as well as other factors outside of Telephone Associates facilities control such as customer location, the

quality of the inside wiring within the home, the Web sites accessed by the customer, usage of the network during peak periods of the day and the customer's equipment within the premise.

Latency is highly variable depending on the network path, other providers in the path, the actual distance to the destination and performance of the end destinations servers. Telephone Associates High-Speed Internet customers should expect roundtrip latency to most general Internet sites in the range from 50-150 milliseconds.

All Telephone Associates High-Speed Internet services are provided either by fiber, or digital subscriber line technology. The particular technology for your service will be based upon what is available in your geographic area. The suitability for real-time applications depends on the speed purchased, bandwidth required for the application, and time of day usage of the application.

## **Commercial Terms**

Customers can learn about the specific pricing and service availability by calling the Customer Service number printed on their bills. A one month minimum of service is required. Different service lengths are available. Telephone Associates may include an early termination fee in the terms of High-Speed Internet services offered to customers.

Rates typically vary according to speed tier, whether you are bundling with another service and length of time you commit to keep the service. As a result, it is not practical to provide standardized disclosure with your specific information, but can be obtained by calling Customer Service.

### **One-time fees**

Certain one-time fees (activation, installation fees, shipping and handling charges) may apply to you in connection with the purchase of your High-Speed Internet service. As with the monthly charge, there is so much variation in these fees for individual transactions, it is not practical to provide a standardized disclosure with your specific information. Other one-time fees (early termination fees) will be imposed if you cancel your service before the end date of your contract with Telephone Associates.

Telephone Associates may require a one-time deposit for your service. The deposit is based on the level of risk associated with each specific application or order and the company credit strategy.

**Internet Cost Recovery Fee** : Amount varies by location and is subject to change.

## **Privacy Policy**

Like most companies, we have certain information about our customers and use it to provide our services. We also share it as needed to meet our business goals or fulfill our legal

obligations. We protect the information we have about our customers and we require those we share it with to protect it too. We use information generated on our networks to manage those networks, to plan for future development, and to keep our services running reliably and efficiently. For example, we monitor data to check for viruses, to control spam, to prevent attacks that might disable our services, to ensure that your traffic does not violate your subscriber agreement or our acceptable use policies, and to guard against other inappropriate or illegal activity. This may involve looking at the characteristics of our network traffic, such as traffic volumes, beginning and ending points of transmissions, and the types of applications being used to send traffic across our network. In limited circumstances, we need to look into the content of the data (such as the specific websites visited, files being transmitted, or application being used) for the purposes described above, in circumstances when we are concerned about fraud or harassment, to repair a problem we detect or that a customer contacts us about, or when we are providing the content of broadband traffic to law enforcement which we only do as authorized by law.

## **Redress Options Policy**

If you have any questions or concerns regarding Telephone Associates High-Speed Internet services and the subjects of this disclosure, you may call the Customer Service number printed on the bills or send us a message using our Contact Us page.

Please be sure to include the following information :

- The first line of the "Message" should be : Internet Management Disclosure**
- Name : optional**
- High-Speed Internet address**
- A brief summary of the nature of your concern**

Telephone Associates takes all such questions and concerns seriously. The appropriate Telephone Associates personnel will review all such submissions and respond in a timely manner.