

COMMUNICOMM

BROADBAND INTERNET SERVICE DISCLOSURES

Consistent with FCC regulations,¹ CommuniComm provides this information about our broadband Internet access services. We call these services our “High Speed Internet.” We welcome questions or comments about this information.

NETWORK PRACTICES

General description. We provide a variety of High Speed Internet offerings to our residential and business customers. We provide the service over our broadband network and through third party fiber optic lines connecting to the Internet. We also contract with one or more companies for certain network monitoring and management services. We monitor our network and traffic patterns and make changes we deem necessary to manage and improve overall network performance. We use reasonable, nondiscriminatory, network management practices to improve overall network performance to ensure a high-quality online experience for all users. Our network management practices do not target any specific content, application, service, or device. As network management issues arise and as technology develops, we may employ additional or new network management practices. We will update these disclosures as necessary.

Related documents and disclosures. Use of our High Speed Internet is also governed by:

- CommuniComm Terms of Use for Internet, Digital TV and Phone services, available at <http://www.jamescable.com/terms.aspx>.
- CommuniComm Allowance Policy, available at <http://jamescable.com/CustomerResources/AllowancePolicy.aspx>.
- CommuniComm Privacy Notice for Cable Television, High Speed Internet and Phone Services, available at <http://www.jamescable.com/Portals/0/Documents/CommuniComm2010Privacy.pdf>.
- CommuniComm High Speed Internet Product Overview, available at <http://www.jamescable.com/ServicesforYourHome.aspx>; and <http://www.jamescable.com/ServicesforYourBusiness.aspx>
- CommuniComm Modem User Guides and Networking and Email guides, all available at <http://jamescable.com/CustomerResources.aspx>.

Congestion management. We describe in this section network management practices used to address congestion on our network.

Congestion management practices used.

Network monitoring. We monitor our network for utilization trends. We receive regular reports showing changes in network traffic and congestion. We use this information to plan increases in bandwidth available, port additions, or additional connectivity to the Internet.

¹ 47 CFR 8.3 and *In re: Preserving the Open Internet, Broadband Industry Practices, Report and Order*, 22 FCC Rcd 17905 (2010).

Network management – bandwidth caps. We use an industry standard best practice data usage threshold of 200GB over a thirty (30) day period for each of our residential High Speed Internet service packages to help us ensure that we meet the needs and expectations of all our High Speed Internet customers. To preserve adequate bandwidth availability for all subscribers and efficiently allocate shared resources, we reserve the right (with a 90 day advance notice) to enforce the bandwidth cap by limiting the bandwidth available to users that exceed the allowance under their service plans. Should conditions warrant our enforcing the cap, users who have exceeded their allowance may experience slower transmission speeds as we limit the bandwidth available to them for the remaining days within that calendar month.

Types of traffic affected. Our congestion management practices do not target any specific content, application, service, or device.

Purposes of congestion management practices. Our High Speed Internet network is a shared network. This means that our customers share upstream and downstream bandwidth. The goal of our congestion management practices is to enable better network availability and speeds for all users. Our congestion management practices serve to:

- Help us adapt and upgrade our network to maintain or improve network performance as demand for our High Speed Internet increases.
- Help us adapt and upgrade our network to maintain or improve network performance as demand for higher bandwidth applications increases. Some examples of higher bandwidth applications are gaming, streaming movies, and streaming high definition video.
- Help us identify potential bandwidth abusers using a substantially disproportionate amount of bandwidth.

Congestion management criteria.

Network monitoring. Our network monitoring provides data to help us manage our network, equipment, technology, and connectivity to the Internet. We conduct network management practices in real time.

We use the data obtained through network monitoring to help us plan upgrades to our service packages, network, equipment, technology, and connectivity to the Internet. As demand for our broadband Internet access service increases, and as demand for higher bandwidth applications increases, we monitor effects on network performance and plan upgrades as we deem necessary. We also monitor traffic and generate reports showing end user usage for identification and management of customers' data usage on our network.

Effects on end user experience. Because our High Speed Internet network is a shared network, periods of high network demand may result in Internet traffic congestion. End users may experience reduced bandwidth or speed during these times.

Typical frequency of congestion. Congestion tends to occur during periods of peak demand for higher bandwidth applications. Generally, the frequency of congestion tends to increase during 7 pm – 1am, especially on Friday and Saturday nights.

Application-Specific Practices. This section discloses any application-specific practices we use, if any.

Management of specific protocols or protocol ports. Not applicable.

Modification of protocol fields. Not applicable.

Applications or classes of applications inhibited or favored. Not applicable.

Device Attachment Rules. This section addresses any limitations on attaching lawful devices to our network.

General restrictions on types of devices to connect to network. We place no general restrictions on lawful devices that a customer may connect our network, so long as the device is: (i) compatible with our network; and (ii) does not harm our network or other users. A customer's computer must meet the minimum requirements set forth in our User Guide, available at <http://jamescable.com/Portals/0/Customer%20Information/UserGuide.pdf>. Our High Speed Internet service works with most types of PCs and laptops including Macs, and other Internet compatible devices like game systems and Internet-enabled TVs. If a wireless router is connected to our High Speed Internet service, wireless Internet compatible devices including computers, tablets, smartphones, and other devices can connect to our network. If a customer or potential customer believes they have an unusual configuration, our customer service department will help determine if there is a compatibility problem. Below we detail the specific devices associated with the technology underlying our High Speed Internet service, Cable Modem.

Cable Modem. Our High Speed Internet requires connection of a cable modem to our network. You can obtain a cable modem from us or you may purchase one from most retail electronics sellers. Only devices that have been fully certified by CableLabs as compliant with the DOCSIS 2.0 or DOCSIS 3.0 specifications may be used.

Network and End User Security. This section provides a general description of the practices we use to maintain security of our network.

Practices used to ensure end user security, including triggering conditions.

Hostile port blocking: We block known hostile ports to prevent unwanted files, browser hacking and virus attacks.

Virus and Spam filtering: Through our third party provider(s) we filter email and website traffic for virus activity and Spam using industry standard virus scanning and prevention techniques. Should an email message be found to contain a virus or other harmful content, the message will be: (i) deleted without notification to either to the sender or the intended recipient(s); or (ii) quarantined with notification sent to the sender or intended recipient.

Practices used to ensure security of the network, including triggering conditions.

Hostile port blocking: We block known hostile ports to prevent unwanted files, browser hacking and virus attacks.

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PERFORMANCE CHARACTERISTICS

General Service Description. Our High Speed Internet service enables a customer to connect an Internet-enabled device to our network. Through our High Speed Internet service, we serve as a local Internet service provider. Our High Speed Internet service enables residential and commercial subscribers to access all lawful content, applications, and services of their choice available on the Internet.

Service technology. We deliver our High Speed Internet over our hybrid fiber-coaxial network using the Data Over Cable Service Interface Specification (DOCSIS). Customers access our network using cable modems. To connect from our network to the Internet, we use equipment called a Cable Modem Termination System (CMTS) that acts as a gateway to the Internet for our customers’ cable modems. This is a shared network, which means that our customers share upstream and downstream bandwidth.

Expected and actual speeds and latency.

Expected performance. We offer customers a variety High Speed Internet service levels. We provide a description of the expected maximum transfer speeds associated with each service level below.

Waycross – JamesCable	Upload Speeds	Download Speeds
CommuniComm Essential	256 KB	800 KB
CommuniComm Extreme	2 MB	15 MB
CommuniComm Plus	768 KB	6 MB
CommuniComm Power	768 KB	8 MB

Legacy- JamesCable	Upload Speeds	Download Speeds
CommuniComm Essential	128 KB	800 KB
CommuniComm Advantage	512 KB	1.5 MB
CommuniComm Preferred	512 KB	3 MB
CommuniComm Plus	800 KB	5 MB
CommuniComm Power	1.5 MB	8 MB
CommuniComm Power Plus	1.5 MB	12 MB

Speed. The speeds we identify for each High Speed Internet service level are the maximum upload and download speeds that customers are likely to experience. We provision our customers’ modems and engineer our network to deliver the speeds to which our customers subscribe. However, we do not guarantee that a customer will actually achieve those speeds at all times. A variety of factors can affect upload and download speeds, including customer equipment, network equipment, congestion in our network, congestion beyond our network, performance issues with an Internet application, content, or service, and more.

Latency. Latency is another measurement of Internet performance. Latency is the time delay in transmitting or receiving packets on a network. Latency is primarily a function of the distance between two points of transmission, but also can be affected by the quality of the network or networks used in transmission. Latency is typically measured in milliseconds, and generally has no significant impact on typical everyday Internet usage. As latency varies based on any number of factors, most importantly the distance between a customer's computer and the ultimate Internet destination (as well as the number and variety of networks your packets cross), it is not possible to provide customers with a single figure that will define latency as part of a user experience.

Actual speed and latency performance. Actual speed and latency may vary depending upon network conditions and other factors. Actual performance of our High Speed Internet in most cases will conform to national wireline broadband Internet speed and latency levels reported by the FCC.² The FCC has reported that customers of coaxial cable-based broadband Internet services receive mean download speeds that are within 93% of advertised speeds during non-peak hours, and 85.7% of advertised speeds during peak hours.³ In addition, the FCC has reported that these same customers experience average latency⁴ delays of 28 milliseconds, increasing by an average of 30 milliseconds during peak hours.

Suitability of the Service for Real-time Applications. Our High Speed Internet service is suitable for typical real-time applications including messaging, voice applications, video chat applications, gaming, and Internet video. If users or developers have questions about particular real-time applications, please contact us.

Specialized Services.

Specialized services offered to end users. We offer several managed services over our network, sharing network capacity with other high speed Internet services. Managed services include Voice over Internet Protocol (VoIP) and dedicated bandwidth to high volume business users.

Effects of specialized services on availability and performance of broadband Internet access service. Our managed services have no effect on the availability and performance of our High Speed Internet.

COMMERCIAL TERMS

Prices. Monthly prices for our High Speed Internet are available at <http://www.jamescable.com/ServicesforYourHome.aspx>; <http://www.jamescable.com/ServicesforYourBusiness.aspx>.

² See FCC's Office of Engineering and Technology and Consumer Affairs Bureau, *Measuring Broadband, A Report on Consumer Wireline Broadband Performance in the U.S.*, OET CGB DOC-308828A1, pp. 4-6 (Aug. 2, 2011) (available at: http://transition.fcc.gov/cgb/measuringbroadbandreport/Measuring_U.S. - Main_Report_Full.pdf).

³ The FCC has defined peak hours measured during "busy hour" as weeknights between 7:00 pm and 11:00 pm local time.

⁴ The FCC has defined latency is the total length of time it takes a signal to travel from an origination point to the nearest server, plus the time for an acknowledgement of receipt to travel back to the origination point. The nearest server is the server providing the minimum round trip time.

Usage-based fees. For customers needing more than our standard monthly usage allowance if 200GB/month, we provide additional usage for an additional fee. Usage based fees applicable to our High Speed Internet are available at <http://jamescable.com/CustomerResources/AllowancePolicy.aspx>. For our customers' convenience we provide customers' online accounts with information regarding their monthly usage that allows them to monitor their usage.

Fees for early termination. Not applicable.

Fees for additional network services. For more information on our additional network services please visit our website, available at <http://www.jamescable.com/ServicesforYourHome.aspx>; <http://www.jamescable.com/ServicesforYourBusiness.aspx>.

Privacy Policies. We reserve the right to disclose network traffic information to third parties solely for purposes of providing and maintaining our Internet service product or if required by law. For information on our privacy policies see our Privacy Notice for Cable Television, High Speed Internet and Phone Services, available at <http://www.jamescable.com/Portals/0/Documents/CommuniComm2010Privacy.pdf>.

Inspection of network traffic. We routinely monitor network and traffic patterns.

Traffic monitoring. Viruses, worms, Trojans, and other “malware” or “spyware” pose a significant threat to our network and users. In an effort to minimize these threats, CommuniComm constantly monitors the activity and traffic patterns of its network. If we reasonably determine that traffic from a user customer is some form of harmful traffic, we will suppress the flow of some or all of the traffic from the user until we determine the traffic has ceased or that the traffic is legitimate traffic. We also monitor traffic and generate reports showing end user usage for identification and management of customers' data usage on our network.

Virus and Spam filtering. Through our third party provider, we filter email and web space traffic for virus activity and Spam using industry standard virus scanning and prevention techniques.

Storage of network traffic information. Dynamic Host Configuration Protocol (DHCP) information is a code included in all network traffic that associates that traffic with a particular cable modem sending or receiving the traffic. We store DHCP information for at least a year.

Provision of network traffic information to third parties. We may disclose network traffic information to third parties solely for purposes of providing and maintain our High Speed Internet service or if required by law.

Use of network traffic information for non-network management purposes. Not applicable.

Redress Options; Practices for resolving end-user and edge provider complaints and questions. End users or edge providers with complaints or questions relating to these disclosures should contact Joseph Shanks at jshanks@JamesCable.com.

Questions. We will endeavor to answer questions promptly via email or voice.

Complaints. For complaints, we will provide an initial response in writing within 15 business days of receipt. We will attempt to resolve complaints informally, escalating the matter to senior management if needed.