GRIDCOM

NETWORK TRANSPARENCY STATEMENT

Gridley Communications, Inc. ("Gridcom" or "Company") an affiliate of Gridley Telephone Co. provides this Network Transparency Statement in accordance with the FCC's Restore Internet Freedom Rules to ensure that you have sufficient information to make informed choices about the purchase of broadband services. Information about Gridcom's other policies and practices concerning broadband are available at www.gridtel.com ("Gridcom Website").

Gridcom engages in network management practices that are tailored and appropriate for achieving optimization on the network considering the particular network architecture and technology of its broadband Internet access service. Gridcom's goal is to ensure that all of its customers experience a safe and secure broadband Internet environment that is fast, reliable and affordable. Gridcom wants its customers to indulge in all that the Internet has to offer, whether it is social networking, streaming videos and music, to communicating through email and videoconferencing.

Gridcom's network management includes congestion- and security-protocol-management and customers generally will not be impacted by the protocols and practices that Gridcom uses to manage its network.

A. Gridcom's Network Transparency Disclosures

Gridcom uses various tools and industry standard techniques to manage its network and deliver fast, secure and reliable Internet service. Gridcom believes in full transparency and provides the following disclosures about its network management practices:

1. **Blocking:** Gridcom does not engage in any practice that blocks access to or discriminates against lawful content, applications, services, or non-harmful devices.

2. **Throttling:** Gridcom does not engage in the practice of degrading or impairing access to lawful traffic on the basis of content, application, service, user, or use of a non-harmful device.

3. **Affiliated Prioritization:** Gridcom does not engage in the practice of favoring some traffic over other traffic for the benefit of an affiliate.

4. **Paid Prioritization:** Gridcom does not engage in the practice of favoring some traffic over other traffic in exchange for consideration, monetary or otherwise. Gridcom does not have plans to enter into paid prioritization deals to create fast lanes.

5. **Congestion Management:** Although Gridcom does not engage in any specific practice to manage congestion, the company monitors the connections on its network in the aggregate in order to determine the rate of utilization. If congestion emerges on the network, Gridcom will take the appropriate measures to relieve congestion.

   On Gridcom's network, all customers have access to all legal services, applications and content online and, in the event of congestion, most Internet activities will be unaffected. Some customers, however, may experience longer download or upload times, or slower surf speeds on the web if instances of congestion do occur on Gridcom's network.

   Customers using conduct that abuses or threatens the Gridcom network or which violates the company's Acceptable Use Policy, Internet service Terms and Conditions, or the Internet Service Agreement will be asked to stop any such use immediately. A failure to respond or to cease any such conduct could result in service suspension or termination.

   Gridcom's network and congestion management practices are 'application-agnostic', based on current network conditions, and are not implemented on the basis of customers' online activities, protocols or applications. Gridcom's network management practices do not relate to any particular customer's aggregate monthly data usage.

   Gridcom also checks for abnormal traffic flows, network security breaches, malware, loss, and damage to the network. If a breach is detected or high volume users are brought to light by complaint, Gridcom provides notification to the customer via email or phone. If a violation of Gridcom's policies has occurred and such violation is not remedied, Gridcom will seek to suspend or terminate that customer's service.

6. **Application-Specific Behavior:** Except as may be provided elsewhere herein, Gridcom does not currently engage in any application-specific behaviors on its network. Customers may use any lawful applications with Gridcom's service.

7. **Device Attachment Rules:** Gridcom does not employ any device attachment rules for its network; customers may use any lawful device. For best results, DSL modems, wireless modems, or other proprietary network gateways used on the Gridcom broadband network should be provided by Gridcom. Customers may attach devices of their choosing to their modems, including wired or wireless routers, laptops, desktop computers, video game systems, televisions, or other network-enabled

electronics equipment. However, *the customer* is responsible for ensuring that its equipment does not harm Gridcom's network or impair the service of other customers. Gridcom is not responsible for the functionality or compatibility of any equipment provided by its customers. Customers are responsible for securing their own equipment to prevent unauthorized access to Gridcom's broadband network by third parties and will be held responsible for the actions of such third parties who gain unauthorized access through unsecured customer equipment.

8. **Network Security:** Gridcom knows the importance of securing its network and customers from network threats and annoyances. The company promotes the security of its network and patrons by protections from such threats as spam, viruses, firewall issues, and phishing schemes. Gridcom also deploys spam filters in order to divert spam from an online customer's email inbox into a quarantine file while allowing the customer to control which emails are identified as spam. Customers may access the spam files through the email. Spam files are automatically deleted if not accessed within a reasonable period.

   As its normal practice, Gridcom does not block any protocols, content or traffic for purposes of network management, but Gridcom may block or limit such traffic as spam, viruses, malware, or denial of service attacks to protect network integrity and the security of our customers.

B. <u>Network Performance</u>

1. Service Descriptions

Gridcom deploys Internet access to its subscribers through hardwired broadband access under Digital Subscriber Line (DSL), Fiber-to-the-Home (FTTH), and terrestrial fixed wireless technologies.

2. Network Performance

Gridcom makes every effort to support advertised speeds and will dispatch repair technicians to customer sites to perform speed tests as needed to troubleshoot and resolve speed and application performance caused by Gridcom's network. Gridcom measures availability, latency, and aggregate utilization on the network and strives to meet internal service level targets.

However, the bandwidth speed at which a particular distant website or other Internet resources may be downloaded, or the speed at which your customer information may be uploaded to a distant website or Internet location is affected by factors beyond Gridcom's control, including the speed of the connection from a distant web server to the Internet, congestion on intermediate networks, and/or limitations on your own computer equipment, including a wireless router. In addition, your service performance may be affected by the inside

wiring at your premise. Accordingly, you, the customer, must consider the capabilities of your own equipment when choosing a Gridcom broadband service. Your computers and/or wireless or other networks in your homes or offices may need an upgrade in order to take full advantage of the chosen Gridcom broadband plan.

For the wireless service, Gridcom measures Bit Error Rate (BER) and the Received Signal Strength Indicator (RSSI) parameters for transmission rates, latency, and traffic every 15 min. For DSL, Fiber and T1 service, Gridcom measures traffic every 5 min. All services are best effort.

Gridcom tests each service for actual and expected access speeds at the time of network installation to demonstrate that the service is capable of supporting the advertised speed. Gridcom recommends that Customers use the speed test located at www.speedtest.net and may contact Technical Support at 866.681.3301 for assistance.

Based on the network information Gridcom receives from its monitoring efforts, Gridcom's network is delivering data transmission rates advertised for the different high-speed Internet services. To be sure, Gridcom has implemented a program of testing the performance of its network by using a test protocol similar to the one sanctioned by the FCC. We installed specific network performance monitoring equipment at aggregation points across our network and conducted a series of tests using this equipment. Gridcom reports the results of this testing below. This result applies to both upload and download data rates, and applies for measurements made both at peak times and over a 24-hour period:

DOWNLOAD & UPLOAD SPEEDS

ADVERTISED	ACTUAL SUSTAINED	PERCENTAGE DIFFERENTIAL
Download		
15 Mbps - DSL	13.5	10
20 Mbps – DSL	19	5
50 Mbps - FIBER	48.5	3
100 Mbps – FIBER	98	2
250 Mbps - FIBER	245	2
500 Mbps - FIBER	490	2
Upload		
1 Mbps – DSL	.85	15
10 Mbps - DSL	9.5	5
50 Mbps - FIBER	48.5	3
100 Mbps - FIBER	98	2
250 Mbps – FIBER	245	2
500 Mbps – FIBER	490	2

3. **Impact of Non-BIAS Data Services**

The FCC has defined Non-Broadband Internet Access Services (Non-BIAS) to include services offered by broadband providers that share capacity with Broadband Internet Access Services (BIAS) (previously known as "Specialized Services") also offered by the provider over the last-mile facilities. At this time, Gridcom is not offering any non-BIAS data services.

C. <u>Commercial Terms</u>

Pricing and additional service information may be found here.

For questions, complaints or requests for additional information, please contact Gridcom at:

Technical Support at 866.681.3301