

Smithville Telephone Company Network Transparency Statement

Smithville Telephone Company provides the following information to comply with the disclosures required by the Federal Communications Commission (FCC) transparency rule effective June 11, 2018. We provide these disclosures to give consumers information necessary to make informed choices about the purchase and use of the Company's broadband Internet access service (the Service).

The FCC transparency rule states as follows:

(a) Any person providing broadband Internet access service shall publicly disclose accurate information regarding the network management practices, performance characteristics, and commercial terms of its broadband Internet access services sufficient to enable consumers to make informed choices regarding the purchase and use of such services and entrepreneurs and other small businesses to develop, market, and maintain Internet offerings. Such disclosure shall be made via a publicly available, easily accessible website or through transmittal to the Commission.

(b) Broadband internet access service is a mass-market retail service by wire or radio that provides the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service. This term also encompasses any service that the Commission finds to be providing a functional equivalent of the service described in the previous sentence or that is used to evade the protections set forth in this part. 83 Fed. Reg. 7852, 7922 (Feb. 22, 2018) codified at 47 C.F.R. §8.1(b).

(c) A network management practice is reasonable if it is appropriate and tailored to achieving a legitimate network management purpose, taking into account the particular network architecture and technology of the broadband Internet access service. 83 Fed. Reg. 7852, 7922 (Feb. 22, 2018) codified at 47 C.F.R. §8.1(c).

Additional information about the disclosure requirements is in the Federal Register, Vol. 76, No. 185, Friday, September 23, 2011 Rules and Regulations Pages 59192 through 59235. This document is not available from Smithville Telephone Company, but can be found through Internet search.

COMMERCIAL TERMS

The rates, terms and conditions associated with the Company's Service can be accessed at www.traceroad.net.

When changes are made to the rates, terms and conditions of the Company's Service, we will post them on our website referenced above. Significant changes in terms and conditions and increases in rates will also be disclosed by bill messages or inserts.

The Company's Privacy Policies can be accessed at www.traceroad.net.

If you believe that the Company's Service is not meeting stated rates, terms and conditions, please contact us so that we can address your concerns by telephone 662-651-4131 Monday thru Friday 8:00 to 4:30, by U.S. Mail to Smithville Telephone Company, Customer Service, 63470 Highway 25 North, Smithville, MS 38870, or by email to custserv@traceroad.net.

NETWORK MANAGEMENT PRACTICES

In offering the Service, the Company recognizes that network issues will arise and, during those times, the Company will undertake actions that are appropriate and tailored to achieving a legitimate network management purpose. The Company notes specifically, the following network management practices. Please note that each of the statements below are subject to the Company's Acceptable Use policy that can be accessed at www.traceroad.net.

1. *Blocking*. The Company does not block or otherwise prevent end user customer access to lawful content, applications, service, or non-harmful devices.
2. *Throttling*. The Company does not intentionally restrict traffic speeds.
3. *Affiliated Prioritization*. The Company does not engage in any practice that directly or indirectly favors any of its affiliates' traffic over other traffic.
4. *Paid Prioritization*. The Company does not engage in any practice that directly or indirectly favors some traffic over other traffic in exchange for consideration, monetary or otherwise.
5. *Congestion Management*. The Company monitors the connections on its network in the aggregate on a continuous basis to determine the rate of utilization. If congestion emerges on the network, Smithville will take the appropriate measures to relieve congestion.
6. *Applications-Specific Behavior*. The Company does not during normal operations (i) block or rate-control specific protocols or protocol ports; (ii) modify protocol fields in ways not prescribed by the protocol standard; or (iii) otherwise inhibit or favor certain applications or classes of applications.
7. *Device Attachment Rules*. Provided that an attachment does not cause network harm, including by way of example, interference with the Company's network security measures, the Company does not restrict

the types of devices that its end user customers may use and attach to the Company's network nor does it have any approval procedures for devices to connect to the Company's network.

8. *Security.* In the event of Denial of Service (DoS), Distributed Denial of Service (DDoS) attack, spoofing or other malicious traffic, Smithville Telephone Company may implement inbound and outbound traffic filtering and/or blocking on specific source and destination IP addresses. These actions if implemented will be performed to ensure reliability and availability of the Smithville Telephone Company Inc. network. These actions will not be utilized for normal Internet applications and traffic.

Performance

1. *Service Description.* Descriptions of the Company's Service, including (1) the service technology; (2) expected and actual access speed and latency; and (3) the suitability of the service for real-time applications, are set forth below:

Several levels of Internet access are available within the Company's service area. DSL (Copper Wireline Facilities) or FTTH (Fiber To The Home) technology is used to provide these services. There is a maximum download and upload rate on each service offering. Latency testing generally shows a 10ms or less round-trip delay to our upstream provider's Internet peering point. Actual rates and latency experienced at a customer location may vary. Current offered speeds and prices are available at www.traceroad.net.

Broadband Internet access is provided using either DSL or FTTH. There is no usage limit.

2. *Impact of Non-Broadband Internet Access Data Services.* Broadband business data services are provided using dedicated facilities separate from those providing broadband Internet access services.

Privacy Policies

The Smithville Telephone Company inspects and records some traffic on its broadband network from time to time to assess network performance and to resolve problems. This information is only used internally by the company and is not retained longer than necessary. The Company's complete privacy policy is at www.traceroad.net.

Redress Options

Questions and complaints may be addressed to the Smithville Telephone Company at 662-651-4131, by fax at 662-651-4711, by email to custserv@traceroad.net, or by visiting the company offices at 63470 Highway 25 North in Smithville, MS. The company's mailing address is 63470 Highway 25 North, Smithville, MS 38870.