

# Net Neutrality Transparency Disclosure

## Open Internet Transparency Disclosure

The following disclosure describes the network practices, performance characteristics and commercial terms for Glenwood Telecommunications pursuant to the Federal Communications Commission's Open Internet Transparency requirements in 47C.F.R §8.3.

### Network Practices

- *Blocking:*

If applicable, any practice (other than reasonable network management elsewhere disclosed) that blocks or otherwise prevents end user access to lawful content, applications, service, or non-harmful devices, including a description of what is blocked.

- *Throttling:*

If applicable, any practice (other than reasonable network management elsewhere disclosed) that degrades or impairs access to lawful Internet traffic on the basis of content, application, service, user, or use of a non-harmful device, including a description of what is throttled.

- *Affiliated Prioritization:*

If applicable, any practice that directly or indirectly favors some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, to benefit an affiliate, including identification of the affiliate.

- *Paid Prioritization:*

If Applicable, any practice that directly or indirectly favors some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, in exchange for consideration, monetary or otherwise.

- *Congestion Management:*

If applicable, descriptions of congestion management practices; types of traffic subject to practices; purposes served by practices; practices' effects on end users' experience; criteria used in practices, such as indicators of congestion that trigger a practice, and the typical frequency of congestion; usage limits and the consequences of exceeding them; and references to engineering standards, where appropriate.

- *Application-Specific Behavior:*

If applicable, whether and why the provider blocks or rate-controls specific protocols or protocol ports, modifies protocol fields in ways not prescribed by the protocol standard, or otherwise inhibits or favors certain applications or classes of applications. Disclosures of user or application based practices should include the purpose of the practice, which data plans may be affected, the triggers that activate the use of the practice, the types of traffic that are subject to the practice and the practice's likely effects on end users' experience

- *Device Attachment Rules:*

If applicable, any restrictions on the types of devices and any approval procedures for devices to connect to the network.

- *Security:*

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If applicable, practices used to ensure end-user security or security of the network, including types of triggering conditions that cause a mechanism to be invoked (but excluding information that could reasonably be used to circumvent network security). The FCC instructs providers to use sound judgment on whether or not to disclose particular security measures. Providers should disclose information that is necessary to allow customers to make informed choices and for content, application, service and device providers to develop, market and maintain Internet offerings. For example, the FCC would expect providers to disclose if security measurements intended to prevent the spread of viruses, malware, spam or other threats also prevent end users from running a mail or web server using their broadband connection.

### Performance Characteristics

- *Service Description:*

A general description of the service, including the service technology, expected and actual access speed and latency, and the suitability of the service for applications. Company Should include the source of your performance measurements.

*Fixed providers may use:*

1. Actual performance based internal testing
2. Consumer data from websites such as [www.measurementlab.net/data](http://www.measurementlab.net/data) or [www.netindex.com/source-data/](http://www.netindex.com/source-data/)
3. The methodology developed in the FCC's Measuring Broadband America report, [http://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2011/db0802/DOC-308828A1.pdf](http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0802/DOC-308828A1.pdf)
4. Other reliable third party sources, such as FCC's Measuring Broadband America report to estimate actual performance

EXAMPLE:

Service Description	Technology	Advertised Speeds	Actual Speeds	Expected Latency	Actual Latency	Applications
768Kbps	Asymmetrical DSL	768kbps downstream / 256kbps upstream	768kbps downstream / 256Kbps upstream	20-50ms	48-52ms	Email, Web Browsing, music streaming, social media
3Mbps	Fiber to the Home	3Mbps downstream / 768kbps upstream	3.7Mbps downstream / 1.5Mbps upstream	16-18ms	16-17ms	All applications listed above plus: standard definition video streaming, high definition video streaming, video calling, multiplayer online gaming

*Mobile Providers may use:*

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1. Actual performance based on internal testing
2. Reliable third party sources such as Nielsen [www.nielsen.com](http://www.nielsen.com) or GWS [www.gwsolutions.com/](http://www.gwsolutions.com/)
3. If company does not have access to reliable testing, may disclose a Typical Speed Range

EXAMPLE:

Service Description	Technology	Advertised Speeds	Typical Speed Range	Expected Latency	Actual Latency	Applications
Mobile Data Service	3G	1Mbps – 3Mbps downstream / 128 kbps – 768 kbps upstream	512kbps - 1.5 Mbps downstream /128 kpbs – 200kbps upstream	100-200ms	198-350ms	Email, Web Browsing, music streaming, social media, standard definition video streaming

- *Impact of Specialized Services:*

If applicable, what specialized services, if any, are offered to end users, and whether and how any specialized services may affect the last-mile capacity available for, and the performance of, broadband Internet access service.

### Commercial Terms

- *Pricing:*

For example, monthly prices, usage-based fees, and fees for early termination or additional network services. Other fees and Data Caps/Allowances must be fully disclosed to ensure customers can make informed choices

- *Privacy Policies:*

For example, whether network management practices entail inspection of network traffic, and whether traffic information is stored, provided to third parties, or used by the carrier for non-network management purposes.

- *Redress Options:*

Practices for resolving end-user and edge provider complaints and questions.