



Compliance Statement and Disclosures for FCC “Transparency Rule”

The Glenwood Telephone Membership Company d/b/a Glenwood Telecommunications, Inc. (the “Company”) provides this information in its good faith effort to comply with the disclosures required by the Federal Communications Commission (“FCC”) revised “transparency” rule effective on June 11, 2018. In this regard, we endeavor through these disclosures to provide consumers with information necessary for them to make informed choices about the purchase and use of the Company’s broadband Internet access service (the “Company’s Service”).

To place our compliance efforts in context, 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) to be 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) to be codified at 47 C.F.R. §8.1(c).

The Company reserves the right to update and modify these disclosures and the underlying policies, in a manner consistent with the FCC’s directives, including by way of example the Company’s terms and conditions, network management practices and performance characteristics. To the extent such changes are made they will be reflected in the links provided below.

March 2023

COMMERCIAL TERMS

The rates, terms and conditions associated with the Company's Service, including by way of example only, early termination and/or additional network service fees, can be accessed via the following link(s): gtmc.net

When changes are made to the rates, terms and conditions of the Company's Service, we will post them on our website using the link(s) referenced above.

The Company's "Privacy Policies" can be accessed via the following link:
<http://gtmc.net/support/policies-terms-and-conditions/>

If you believe that the Company's Service is not meeting the rates, terms, and conditions applicable to what you have ordered, please feel free to contact us so that we can address your concern:

Via Telephone *Toll Free:* 866-756-4746 or *Local:* 402-756-3131
Monday through Friday, 8:00am to 5:00pm

Via Email info@glenwoodtelco.net

Via Mail Stanley Rouse, CEO / General Manager
PO Box 357
Blue Hill, NE 68930

We strongly encourage you to contact us in order to discuss your concerns. If based on those discussions there is some remedial action necessary, we can work together to implement it.

NETWORK MANAGEMENT PRACTICES

In offering the Company's Service, the Company recognizes that, at times, 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 "permitted use" policy, available at the following link:

http://gtmc.net/wp-content/uploads/2002/05/Acceptable.Use_Policy08.2021.pdf

1. *Blocking.* The Company does not block or otherwise prevent end user customer access to lawful content, applications, service, or non-harmful devices. Additionally, the Company does not block users from accessing lawful web sites, subject to our reasonable network management practices nor does the Company block applications that may compete with either the Company's or one of its affiliate's voice service products, subject again to our reasonable network management practices.
2. *Throttling.* Except where network congestion may occur, the Company strives to avoid any degradation or impairment of access to lawful Internet traffic on the basis of content, application, service, user, or use of a non-harmful device. Where service congestion occurs, the Company Service's speed may be temporarily reduced.
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 currently reviews and analyzes traffic data when necessary to determine whether additional circuits are needed to address congestion.
6. *Application-Specific Behavior.* The Company does not (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.* The Company maintains the ability to implement reasonable practices to ensure network security and integrity, including by addressing traffic that is harmful to the network or traffic that is unwanted by the end users of our Internet service.

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 below:

Service Description. The Company provides service using the following technologies:

- **A 5 GHz wireless broadband** product is offered in the following communities of Nebraska: Burress, Geneva, Grafton, Hebron, Nelson, Ohiowa, Shickley, Strang, Superior, and Sutton; rural Fillmore, Clay, Nuckolls, and Thayer counties, Nebraska.
- **Fiber to the home broadband** service is provided in the following communities of Nebraska: Axtell, Blue Hill, Bruning, Burress, Clay Center, Deweese, Fairfield, Fairmont, Franklin, Geneva, Grafton, Guide Rock, Hastings, Hebron, Hildreth, Holdrege, Juniata, Kenesaw, Keystone, Lemoyne, Minden, Nelson, Shickley, Superior, Sutton, and Wilcox; rural Adams, Clay, Fillmore, Franklin, Kearney, Keith, Nuckolls, Phelps, Thayer, and Webster counties, Nebraska.

Expected and Actual Transmission Speed. Based upon on internal testing conducted by the Company, the actual expected performance for the Company's service offerings are as follows:

5 GHz Wireless

<u>Service</u>	<u>Download</u>	<u>Upload</u>	<u>Latency</u>
30 Mbps	30 Mbps	15 Mbps	20-25 ms

Fiber to the Home

<u>Service</u>	<u>Download</u>	<u>Upload</u>	<u>Latency</u>
300 Mbps	300 Mbps	150 Mbps	10-25 ms
500 Mbps	500 Mbps	250 Mbps	10-25 ms
700 Mbps	700 Mbps	350 Mbps	10-25 ms
1000 Mbps	1000 Mbps	500 Mbps	10-25 ms

This information is based upon the mean upload and download speeds in megabits per second during the "busy hour" between 7:00 p.m. and 11:00 p.m. on weeknights.

Suitability for Real Time Applications. All of the Company's Internet service offerings can be used for real time applications. However, performance of those applications may improve at higher transmission speeds.

2. *Impact of Non-Broadband Internet Access Service Data Services.* The Company's Service does not currently include any non-broadband Internet access service data services.