# **Open Internet Principles of Central Coast Internet**

The Federal Communications Commission issued rules to preserve the Internet as an open platform. These rules went into effect on November 20, 2011 and can be found at this link: <a href="http://www.gpo.gov/fdsys/pkg/FR-2011-09-23/html/2011-24259.htm">http://www.gpo.gov/fdsys/pkg/FR-2011-09-23/html/2011-24259.htm</a>. All Internet service providers are required to post information regarding various issues so that consumers, both residential and business, can make informed choices about choosing an Internet service provider. This document contains information regarding our services and in compliance with the FCC's rules. The policies contained herein serve as a supplement to the existing terms of service.

### The FCC's rules focus on four primary issues:

- Transparency. Fixed and mobile broadband providers must disclose the network management practices, performance characteristics, and terms and conditions of their broadband services;
- No blocking. Fixed broadband providers may not block lawful content, applications, services, or non-harmful devices; mobile broadband providers may not block lawful Web sites, or block applications that compete with their voice or video telephony services; and
- No unreasonable discrimination. Fixed broadband providers may not unreasonably discriminate in transmitting lawful network traffic.
- Reasonable network management. ISPs may engage in reasonable network management to maintain a high quality of service for broadband Internet access.

### **Network Practices**

ISPs must disclose their network practices, specifically in the four general areas listed below. ISPs may not block lawful content, applications, services, or non-harmful devices, subject to reasonable network management. An ISP may not block consumers from accessing lawful Web sites, subject to reasonable network management; nor shall the ISP block applications that compete with the provider's voice or video telephony services, subject to reasonable network management. ISPs may not unreasonably discriminate in transmitting lawful network traffic over a consumer's broadband Internet access service, although, reasonable network management shall not constitute unreasonable discrimination. The FCC's rules state that 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.

# **Congestion Management:**

We manage our network congestion to maintain stability. We have a finite amount of bandwidth to share amongst our subscribers. Because of this, when we approach capacity, it is sometimes necessary to reduce the bandwidth capacity of subscribers who are operating at the maximum subscribed bandwidth. This occurs very infrequently and is handled on a case-by-case basis.

Our network utilizes packet prioritization (QoS) because many of our subscribers use Voice over Internet Protocol (VoIP) telephones. The enforcement of QoS assigns a higher priority to telephone calls than it does to other types of data (like operating system update downloads).

The subscribers' see their real-time applications like games, phone calls, webbrowsing and streaming videos with little or no jitter most of the time. Background applications may be delayed because priority is given to the more time-critical applications. At times, when the network is operating near its total capacity, subscribers may experience noticeable delays in the transport of their data.

# Application-Specific Behavior:

In the event that an application seems to be consuming excessive bandwidth, we determine the ports that are being used and restrict those ports. This is currently done manually and the subscriber is notified by email or phone. The most common cause of this type of blocking is peer-to-peer file sharing. The subscriber is usually not aware that other people are copying data from their computers when this happens. Once they know how to limit the bandwidth to a reasonable level, the ports are opened up again.

## **Device Attachment Rules:**

Any device that subscribers attach to our network must conform to the protocol standards specified in the appropriate Requests For Comments (RFCs). The RFCs have been provided and adopted by the World Wide Web Consortium and are the basis for the internetworking practices of the Internet.

### Security:

We only allow access to our network through our Access Points (ACs). Our Customer Premises Equipment (CPE) is programmed to authenticate itself to our network before it can connect. This is done through a combination of Access Control Lists (ACLs), Encryption keys and Point to Point Protocol over Ethernet (PPPoE) Authentication. The CPEs are not accessible to subscribers. Any changes needed can be requested through our technical support lines.

#### **Performance Characteristics**

ISPs must disclose the following network performance characteristics:

# Service Description:

Central Coast Internet provides Fixed Wireless Internet access services. We use FCC licensed radio devices which operate on unlicensed microwave spectrum. We have several access points positioned around our service area that provide coverage for our subscribers. We currently provide service plans that range from 128 kilobits per second (kbps) up to 1 Megabit per second (Mbps). All plans are symmetrical with low latency (typically ping times from 50ms to 200ms for sites worldwide). This makes them suitable for VoIP, Virtual Private Networks (VPNs) and other real-time applications.

### <u>Impact of Specialized Services:</u>

VoIP services are available through Central Coast Internet. We don't manage our network differently for subscribers using our VoIP service than we do for those using other vendors VoIP. Our network management is not influenced by the applications that our subscribers buy from us or from other vendors.

#### **Commercial Terms**

ISPs must disclose the commercial terms of its broadband Internet access service including those listed below.

# **Pricing:**

Pricing for our plans can be found at <a href="http://www.centralcoastinternet.com/wireless.html">http://www.centralcoastinternet.com/wireless.html</a>
Service is provided on a month-to-month basis. There is a 30 day money-back satisfaction guarantee. Beyond 30 days, we bill for service on the first day of the month for services received that month.

#### **Privacy Policies:**

We don't keep track of any browsing activity other than bandwidth used and subscriber IP address. We conform to CALEA rules which require us to cooperate with bona fide law enforcement agencies. When served with a warrant, Central Coast Internet will comply fully with the terms of that warrant. Without a warrant, no information about our subscribers will be provided.

We never sell (or in any other way disseminate) any information about our subscribers activities, personal or financial information. The only exception is that we may use statistics about our subscribers in aggregate for advertising and promotional purposes. We will not disclose whether an entity is (or is not) a subscriber.

# **Redress Options:**

If a customer has a dispute with Central Coast Internet, they may contact us for resolution of the dispute. If we don't resolve the problem to their satisfaction, the customer has the option to discontinue service or pursue whatever litigation they deem appropriate. Any legal claims must be brought in San Benito County, CA and will be subject to the laws and regulations that prevail in that jurisdiction.

### **FCC Notice**

If a customer believes that these open Internet rules are not being met, the customer may file an informal complaint at the Federal Communications Commission. The FCC urges customers to submit any complaints via its website at the following address: <a href="http://esupport.fcc.gov/complaints.htm">http://esupport.fcc.gov/complaints.htm</a>. Customers may also file a formal complaint at the FCC using Part 76 of the Commission's rules.

# **Additional Disclaimers**

The Open Internet Rules, as adopted, and these Open Internet Principles are not intended to affect, alter or otherwise supersede the legal status of cooperative efforts by broadband Internet Access Service Providers and other service providers that are designed to curtail infringement in response to information provided by rights holders in

a manner that is timely, effective, and accommodates the legitimate interests of the company, rights holders, and end users. Furthermore, the FCC's Open Internet Rules, as adopted, and this company's Open Internet Principles do not prohibit the company from making reasonable efforts to address the transfer of unlawful content or unlawful transfers of content. For additional information, please review the Acceptable Use Policy.