

Chickasaw Holding Company, Inc.

Broadband Internet

Network Management Practices, Performance Characteristics, and Terms and Conditions

Effective September 25, 2018 Chickasaw Holding Company, Inc. through its affiliates Chickasaw Long Distance, Inc. and Chickasaw Telecommunications Services, Inc. (“CHC”) has adopted the following network management practices, performance characteristics, and commercial terms and conditions for its broadband Internet access services in compliance with Federal Communications Commission regulations.

These practices, characteristics, terms and conditions are intended to help preserve the Internet as an open framework that enables consumer choice, freedom of expression, end-user control, competition, and freedom to innovate without permission, while permitting the Company to manage its network in a responsible and professional manner.

CHC may add, delete, or modify certain practices, performance characteristics, and terms and conditions from time to time at its discretion. The Company will endeavor to provide notice of rate changes thirty (30) days prior to their effective date, but reserves the right to use a shorter notice period when regulatory, operational, technical or other circumstances warrant.

In compliance with FCC 47 CFR § 8.1, CGB Docket No. 18-142, Restoring Internet Freedom ISP Disclosures, CHC provides the following responses.

1. **Network Management Practices.** CHC manages its network with the goal of providing the best practicable broadband Internet experience for its customers. Within the scope of its resources, it attempts to deploy and maintain adequate capacity and facilities within its own network, and to acquire sufficient third-party capacity or facilities as necessary. The Company uses its best efforts to monitor, address and minimize, but does not guarantee that they can prevent, the effects of spam, viruses, security attacks, network congestion and other phenomena that can degrade service.

- a. **Blocking.** 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.

CHC Response. Under normal circumstances CHC does not block end user traffic, content, applications, services or devices; however, end user traffic or access may be temporarily blocked to address network security concerns or violations of Terms of Service.

In order to ensure network availability, the following commonly abused ports are blocked by CHC:

Port	Protocol	Applications	Block Direction
19	UDP TCP	Character Generator Protocol	Ingress Egress
135	UDP TCP	Microsoft DCOM Service Control Manager	Ingress Egress
137	UDP TCP	Microsoft NetBIOS Name Service	Ingress Egress
138	UDP TCP	Microsoft Datagram Service	Ingress Egress
139	UDP TCP	Microsoft Session Service	Ingress Egress
161	UDP TCP	SNMP	Ingress Egress
162	UDP TCP	SNMP	Ingress Egress
445	UDP TCP	Microsoft Server Message Blocks	Ingress Egress
901	UDP TCP	SNMPNAMERES	Ingress Egress
1900	UDP	Microsoft UPnP SSDP	Ingress Egress

- b. **Throttling.** 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.

CHC Response. Under normal circumstances, CHC does not throttle end user traffic. If, however, CHC identifies or suspects malicious activity or violations of Terms of Service within the network, associated traffic or devices may be temporarily blocked.

- c. **Affiliated Prioritization.** 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.

CHC Response. CHC does not implement affiliated prioritization practices.

- d. **Paid Prioritization.** 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.

CHC Response. CHC does not implement paid prioritization practices.

- e. **Congestion Management.** Descriptions of congestion management practices, if any. These descriptions should include the types of traffic subject to the practices; the purposes served

by the practices; the practices' effects on end users' experience; criteria used in practices, such as indicators of congestion that trigger a practice, including any usage limits triggering the practice, and the typical frequency of congestion; usage limits and the consequences of exceeding them; and references to engineering standards, where appropriate.

CHC Response. CHC does not implement customer based congestion management policies or practices. Network routing and path management practices are based on aggregated system and facility capacities and utilization.

- f. **Application-Specific Behavior.** Whether and why the ISP 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.

CHC Response. CHC does not modify protocol fields or parameters in any manner inconsistent with industry defined protocol standards. Certain ports and protocols described in section 1.a. Blocking are blocked due to security concerns.

- g. **Device Attachment Rules.** Any restriction on the types of devices and any approval procedures for devices to connect to the network.

CHC Response. CHC does not restrict the number or type of end-user devices connected by a subscriber.

- h. **Security.** Any 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 be reasonably be used to circumvent network security).

CHC Response. CHC does not provide security or traffic monitoring services for broadband subscribers as part of the base package offering. Such services may be provided under a managed services agreements or as part of a professional services engagement, however.

2. Performance Characteristics

- a. **Service Description and Performance.** A general description of the service, including the service technology, expected and actual access speed and latency, and the suitability of the service for real-time applications.

CHC Response. Through its affiliate companies (CLD and CTSI) CHC provides residential and commercial broadband services in its nine exchanges, all located in Oklahoma. Specifics of CHC's broadband offerings, which differ by location, are described on CHC (and its affiliates' website), accessible at <http://www.chickasawholding.com/>. CHC's broadband offerings range from 2 Mbps to 1 Gbps based on subscriber location, package availability and delivery method. CHC attempts to monitor and provide network capacity in such a way as to provide stated performance rates to all subscribers.

- b. Impact of Specialized Services.** If applicable, what nonbroadband Internet access service data services, if any, are offered to end users, and whether and how any non-broadband Internet access service data services may affect the last-mile capacity available for, and the performance of, broadband Internet access service.

CHC Response. CHC provides wholesale and enterprise services via its affiliate companies. This network provides backhaul services for CHC's broadband Internet products; however, its capacity management practices aimed at eliminating or minimizing traffic delays, including broadband subscriber traffic, are in place.

3. Commercial Terms

- a. Privacy Policies.** A complete and accurate disclosure about the ISP's privacy practices, if any. For example, whether any network management practices entail inspection of network traffic, and whether traffic is stored, provided to third parties, or used by the ISP for non-network management purposes.

CHC Response. Network management and troubleshooting practices, particularly security related issues, occasionally require the inspection, collection and analysis of network traffic. In such instances the collection and storage of subscriber traffic is kept to a minimum and is generally not associated with a specific subscriber. Subsequent to problem resolution any collected traffic is destroyed. Unassociated network traffic may be shared with vendors or equipment manufacturers in the core of network or security support and troubleshooting.

- b. Redress Options.** Practices for resolving complaints and questions from consumers, entrepreneurs, and other small business.

CHC Response. Complaints or questions can be made in person at our office, located at 124 W. Vinita, Sulphur, OK 73086, or by phone at (580) 622-2111.