

WELLMAN COOPERATIVE TELEPHONE ASSOCIATION

NETWORK MANAGEMENT

Wellman Cooperative Telephone Association disclosures on FCC Open Internet Rules

Service Offerings

Wellman Cooperative Telephone Association (WCTA) directly offers broadband ISP services through Aureon in its markets. Please visit the WCTA website to check availability, speed options and pricing.

Performance

Aureon is the internet upstream provider for WCTA. Aureon offers a speed test site to any user or customer. It can be accessed here: Aureon Speed Test or <https://aureon.speedtestcustom.com/>. These tests are heavily dependent on a customer's home network configuration and computers, and therefore do not reflect the performance of the WCTA network only.

Your Internet Service Speeds

WCTA provides residential and commercial customers with a variety of high-speed Internet plans from which to choose, ranging from our initial tier (with download speeds up to 100 megabits per second ("Mbps"), and upload speeds up to 100 Mbps to our top tier (with download speeds up to 1000 Mbps, and upload speeds to 1000 Mbps). WCTA provisions its customers' services and engineers its network to ensure that its customers can enjoy the speeds to which they subscribe. However, WCTA does not guarantee that a customer will always achieve those speeds. Without purchasing an expensive, dedicated Internet connection, no Internet Service Provider ("ISP") can always guarantee a particular speed to a customer. WCTA advertises its speeds as "up to" a specific level based on the tier of service to which a customer subscribes.

The "actual" speed that a customer will experience while using the Internet depends upon a variety of conditions, many of which are beyond the control of an ISP such as WCTA. These conditions include:

1. **Performance of a customer's computer**, including its age, processing capability, its operating system, the number of applications running simultaneously, and the presence of any malware and viruses.
2. **Type of connection between a customer's computer and wireless router**. For example, wireless connections may be slower than direct connections into a router. Wireless connections also may be subject to greater fluctuations, interference and congestion. WCTA does not recommend wireless connections for use with its higher speed tiers as many wireless connections do not perform at the speeds delivered by these tiers.
3. **The distance packets travel (round trip time of packets)** between a customer's computer and its final destination on the Internet, including the number and quality of the networks of various operators in the transmission path. The Internet is a "network of networks." A customer's connection may traverse the networks of multiple providers before reaching its destination, and the limitations of those networks will most likely affect the overall speed of that Internet connection.
4. **Congestion or high usage levels at the website or destination**. If a large number of visitors are accessing a site or particular destination at the same time, your connection will be affected if the site or destination does not have sufficient capacity to serve all of the visitors efficiently.
5. **Gating of speeds or access by the website or destination**. In order to control traffic or performance, many websites limit the speeds at which a visitor can download from their site. Those limitations will carry through to a customer's connection.
6. **The performance of the router you have installed**. Router performance may degrade over time, and certain routers are not capable of handling higher speeds. This is the reason that WCTA, like all other ISPs, advertises speeds as "up to" a particular level, and does not guarantee them.

There are other speed tests that measure Internet performance. Please note, however, that all speed tests have biases and flaws. Each of these tests measures limited aspects of an ISP's speed and therefore must be seen as a guide rather than definitive measurements of performance.

Latency

Latency is another measurement of Internet performance. Latency is the time delay in transmitting or receiving packets on a network. Latency is primarily a function of the distance between two points of transmission, but also can be affected by the quality of the network or networks used in transmission. Latency is typically measured in milliseconds, and generally has no significant impact on typical everyday Internet usage. As latency varies based on any number of factors, most importantly the distance between a customer's computer and the ultimate Internet destination (as well as the number and variety of networks your packets cross), it is not possible to provide customers with a single figure that will define latency as part of a user experience.

Congestion Management

WCTA does not implement any congestion management techniques. WCTA operates our network to accommodate the necessary traffic requirements. In the event of congestion, all traffic is classified as best effort.

Our congestion management approach will change over time, as we continue to study and enhance our practices and as new technologies emerge. In the meantime, we will continue to invest in our network in accordance with our normal course of business operations, which includes installing technology that will increase the speed and capacity of our services.

Content, Applications, Service and Device Providers

As a full-service Internet Service Provider, WCTA delivers a variety of Internet-based applications. These include:

- Voice over Internet Protocol (VoIP)
- Email

WCTA does not discriminate any customer traffic. WCTA utilizes network management techniques that are equal and standard across all user applications. We do not modify our network to make our directly served applications perform better than applications a user would access over the general Internet. For example, WCTA does not manipulate our network to perform better for customers accessing WCTA email servers versus WCTA customers accessing Google's Gmail.

The network management practices employed by WCTA do not differ between our directly offered applications to those general applications offered over the Internet.

Security Measures

In the event of Denial of Service (DoS), Distributed Denial of Service (DDoS) attack, spoofing or other malicious traffic, WCTA will implement inbound and outbound filtering on specific hosts. These actions will be performed to ensure reliability and availability of the WCTA Network. These actions will not be utilized for normal Internet applications and traffic.

NOTE: Aureon may perform this action on behalf of WCTA equipment that is managed by Aureon.

Privacy Policy

WCTA has provided this privacy statement in order to demonstrate our firm commitment to your privacy. The following policy discloses our information gathering and dissemination practices for WCTA.

Information

WCTA is the sole owner of the information collected on its website.

Viewer Privacy

WCTA does not collect personal information such as names, e-mail addresses, postal addresses, or telephone numbers. Since we do not collect any personal information on this Website, we do not share any personal information with any third parties, nor do we use any personal information for any purposes.

IP Addresses

As noted above, we do not collect any personal information on this Web site. We do, however, collect and store information about your Internet connection when you visit our website to read or download information, such as reports, news, etc. We use this information to track Website use, measure site traffic, and improve site navigation and information. We collect information that identifies:

- The name of the domain you access the Internet with.
- The type of web browsing software you use to view our site.
- The date and time of your access.
- The platform you are using (i.e., Windows, Apple or Unix).

This information is never sold, given or disclosed to third parties. This information is used internally to administer our web site, provide better services to the public, and provide aggregate traffic statistics to WCTA staff. No personal information is collected.

Hyperlinks

Additionally, this site contains links to other sites. WCTA is not responsible for the privacy practices or the content of such Websites unless operated directly by WCTA. We encourage you to note when you leave our website and read the privacy statements of each website that collects personally identifiable information.

Acceptance and Jurisdiction

By using this service, you agree that you have read, understand and will abide, and be bound, by the terms of this Web Site Privacy and Policies ("Terms"). If you do not agree to these Terms, please do not use the WCTA web site. These Terms shall be governed in all respects in accordance with the laws of the State of Iowa without regard to the conflict or choice of law rules thereof. Courts sitting in the State of Iowa, federal and state, shall have exclusive jurisdiction over any dispute arising hereunder.

WCTA reserves the right to change, modify or update this statement at any time without notice.

Contacting WCTA

If you have any questions about this privacy statement, the practices of this site, or your dealings with WCTA, you may contact us at the following:

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