

COMPLIANCE STATEMENT AND DISCLOSURES FOR FCC “TRANSPARENCY RULE”

Ringgold Telephone Company (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.

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 links:

RTC Internet Service Agreement -

https://www-rtctel-com-uploads.s3.amazonaws.com/resource_588bb8e93d647.pdf

RTC Internet DSL Service Agreement -

https://www-rtctel-com-uploads.s3.amazonaws.com/resource_588bb88602e41.pdf

RTC Internet SOHO Networking Terms and Conditions -

https://www-rtctel-com-uploads.s3.amazonaws.com/resource_588bb8feb8e0c.pdf

RTC Internet Web Hosting Agreement -

https://www-rtctel-com-uploads.s3.amazonaws.com/resource_588bb93c0f4ba.pdf

Wholesale Wireline Broadband Internet Transport Service (WBITS) -

https://www-rtctel-com-uploads.s3.amazonaws.com/resource_588bb99aa9ae4.pdf

Digital Millennium Copyright Act -

https://www-rtctel-com-uploads.s3.amazonaws.com/resource_588bb8124bafd.pdf

Rates – https://www.rtctel.com/uploads/resource_5b1abfc739e9e.pdf

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

The Company's "Privacy Policies" can be accessed via the following link:

https://www-rtctel-com-uploads.s3.amazonaws.com/resource_588bb95664689.pdf

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 – Sales, Billing, and Customer service: (706) 965-1234

Repair and Call Center: (706) 965-2301

Via Email -- support@catt.com

Via Mail -- Andy LeGrande
Regulatory and Business Development Analyst

P.O. Box 869
Ringgold, GA 30736

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 (https://www-rtctel-com-uploads.s3.amazonaws.com/resource_588bb8014b88b.pdf).

1. *Blocking.* The Company does not block or otherwise prevent end user customer access to lawful content, applications, service, or non-harmful devices.
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 periodically monitors the connections on its network in the aggregate to determine the rate of utilization. If congestion emerges on the network, the Company will engage in the re-routing of Internet traffic to relieve congestion. In order to reduce instances of congestion, the Company has redundancy in the network so that each route has the capacity to handle normal network usage. On our core and access networks, the Company may increase capacity by adding FTTH nodes, transport, Internet aggregation routers and bandwidth, as needed. On the Company's network, all customers have access to all legal services, applications and content online and, in the event of congestion, most Internet activities will be unaffected. Some customers, however, may experience longer download or upload times, or slower surf speeds on the web when instances of congestion do occur on the Company's network. Customers whose conduct abuses or threatens the Company's network or which violates the Company's Acceptable Use Policy or Internet service Terms and Conditions will be asked to stop any such use immediately. A failure to respond or to cease any such

conduct could result in service suspension or termination. The Company's network and congestion management practices are 'application agnostic', based on current network conditions, and are not implemented on the basis of customers' online activities, protocols or applications. The Company's network management does not relate to any particular customer's aggregate monthly data usage.

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 knows the importance of securing its network and customers from network threats and annoyances. The company promotes the security of its network and patrons by providing resources to its customers for identifying and reporting such threats as spam, viruses, firewall issues, and phishing schemes. The Company also deploys spam filters in order to divert spam from an online customer's email inbox while allowing the customer to control which emails are identified as spam. The Company filters email for spam and viruses. As its normal practice, the Company does not block any protocols, content or traffic for purposes of network management except that the company may block or limit such traffic as spam, viruses, malware, or denial of service attacks to protect network integrity and the security of our customers. Except as may be provided elsewhere herein, the Company does not currently engage in any application-specific behaviors nor does it employ any device attachment rules for its network. The Company reserves the right to block certain well-known ports that are commonly exploited on the Internet.

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, can be accessed via the following link:

https://www.rtetel.com/uploads/resource_5b1abf486b72c.pdf

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