



Columbia Power & Water Systems

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Columbia Power and Water Systems Open Internet Transparency Statement

The following disclosures apply to Columbia Power and Water Systems (“CPWS”) broadband Internet access service (“Internet Service”). The disclosures pertain solely to our Internet Service offerings and do not apply to any voice, video or other specialized services offered by CPWS. The information contained in this disclosure is subject to modification without notice, as we deem necessary and appropriate. These disclosures are in addition to the other disclosures and terms and conditions set forth on our website at <https://cpws.com/about/>.

CATEGORY 1: Network Management Practices

1. Congestion Management:

CPWS works to ensure that its Internet Service subscribers have a high quality online experience. The bandwidth and network resources used to deliver our Internet Service are limited and shared among users. Congestion analysis is performed daily by CPWS staff, which reviews all volumes of traffic ranging from individual network ports to the main two core aggregation ports. Each component of the network is reviewed for bandwidth usage. The acceptable utilization range is below 80% of peak network usage. Once peak bandwidth traffic usage exceeds 80%, that section of the network is engineered to augment the network to increase capacity and available bandwidth for our customers. The sole purpose of congestion monitoring and management is to provide CPWS customers with the best experience by maximizing available bandwidth on our network.

2. Application-Specific Behavior:

CPWS does not use any application-specific network management practices. Further, CPWS does not block or rate-control specific protocols or protocol ports, modify protocol fields (in ways not prescribed by the protocol standard), and does not inhibit or favor certain applications or classes of applications. CPWS does not discriminate against or otherwise prevent users of its Internet service from sending and receiving the lawful content of their choice; running lawful applications and using lawful services of their choice; or connecting their choice of legal devices, as long as such applications, services and devices do not harm the network or the provision of Internet Services, facilitate theft of service, or harm other users of the service. Similarly, CPWS does not impair or degrade particular content, applications, services, or non-harmful devices. Application-Specific Behavior is not regulated or controlled by CPWS. However, CPWS does have the ability to see the amount bandwidth usage that is being used by a specific application/destination at a specific moment in time (flow monitoring). This usage information is only retained for a short period of time in order to provide a trending profile.

3. Device Attachment Rules:

Customer premise equipment attachment rules for CPWS’ Internet Service are dictated by the network technology platforms employed (DOCSIS and FTTx) and several other factors. CPWS provides customer premise equipment to its Internet Service customers free of charge with

active service subscription. Should a customer choose to add their own cable modem to the network, it must be a DOCSIS 3.0 approved device. Customer devices that attach to the network are the sole responsibility of the customer and CPWS does not restrict customer devices in any way.

4. Network Security Practices:

CPWS actively works to address threats posed by harmful and unwanted traffic, and reserves the right to protect the security and integrity of its network and its customers by any lawful means. CPWS employs security best practices to protect CPWS core networking assets, including but not limited to routers, switches, firewalls, CMTS units and servers. Appliance-based and host-side firewalls are used to protect server assets. Access lists and strong passwords are used to protect network devices. Centralized authentication, authorization and accounting is also frequently utilized, where possible.

5. Blocking:

CPWS does not block nor restrict access to any lawful content, applications, services or non-harmful devices on its network. However, to protect our customers, we may use reasonable network management practices to block or limit sources that are commonly used to launch malware, or other malicious attacks, send spam, or steal an end-user's identity or personal information.

6. Throttling:

CPWS does not throttle, degrade or impair access to lawful Internet traffic based on the content, application, service, user or the use of a non-harmful device.

7. Affiliated prioritization and / or paid prioritization:

CPWS does not intentionally participate in any method of traffic shaping, prioritization, or resource reservation, in exchange for consideration, monetary or otherwise.

CATEGORY 2: Network Performance Characteristics

Service Description:

CPWS provides Internet Service to customers through a redundant DOCSIS-based cable modem platform and a fiber-based FTTx platform. The company's Internet provides the capability to transmit data to and receive data from all or substantially all Internet endpoints and is suitable for real-time applications. CPWS offers different tiers of Internet Service for residential and commercial customers. The tiers are primarily differentiated by the speed with which data is transmitted and received and, in some cases, the amount of data transfer allowance. The price of each tier varies, primarily in relation to the data transfer speed of each. Tier characteristics may affect the suitability of a specific tier of service for the way you access and use the Internet. The rates, terms and conditions of service are subject to change from time to time and all tiers may not be available in all areas. For detailed information pertaining to CPWS Internet service offerings and packages, please visit <https://cpws.com/powernet/> or call 931-388-4833.

Speeds:

Residential Internet service is provisioned for 200.0 Mbps download and 20.0 Mbps upload with in-network latency and jitter less than 10 ms. Residential Internet service is not contracted and does not have any early termination fees. The “actual” speed a customer experiences at any particular time may vary based on a number of factors and conditions, many of which are outside of our control. These conditions include, but are not limited to: performance of customer’s Internet-connected devices; the connection between a customer’s computer and modem; the distance packets travel (round trip); any congestion or high usage levels at the website or destination; any 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; the suitability of the cable modem; and the capacity limitations on CPWS’ network.

Data Usage Allowances:

CPWS does not have any charges for bandwidth usage.

Impact on Specialized Services:

CPWS offers dedicated fiber transport, dedicated fiber IP, dark fiber lease, GPON transport and IP. With these different types of technologies and physical networks, the networks are not in contention with each other.

CPWS offers Voice-over-IP (“VoIP”) services which use shared network capacity. In order to accommodate the technical requirements of VoIP service, CPWS gives VoIP traffic priority in its network over general data traffic. However, because VoIP services use relatively little bandwidth, VoIP services are not likely to affect the performance of CPWS’ Internet Service. Although all services are affected at any given time by the total network usage, CPWS’ provision of specialized services does not adversely affect its provision of Internet Services.

Performance:

The FCC requires ISPs to disclose information regarding the expected and actual speeds and latency of our Internet Services. There are a number of publicly available sources of information regarding actual broadband performance, each of which uses a different methodology and thus may produce different results. Please note, however, that all performance tests are based on certain assumptions and therefore have certain inevitable biases and flaws. The results of such tests therefore should be considered a guide rather than a definitive measurement of performance. Also, customers should keep in mind that a speed a customer experiences at a specific location may vary from the average speed calculated on a company-wide basis. In addition, these tests are dependent on a variety of factors, including the customer’s home network configuration, modem and Internet-connected devices and the time of day, and therefore do not reflect the performance of the CPWS network only. Customers can check the speed of their current Internet connection using free commercial speed tests available on other sites.

The table below shows CPWS’ expected and actual upstream and downstream speeds and expected and actual latency during busy and non-busy times, for our upgraded markets. Performance data reflected below was collected by CPWS during busy and non-busy times over a 24-hour period for each of the Internet Service levels reflected on the table below and reflects

an average result. The results below are illustrative of what the majority of users in our markets experience on average. However, the results do not reflect the performance levels to be expected by any individual customer at any particular time.

Provisioned Speed (download/upload in Mbps)	Expected (Mbps)	Actual (Mbps)	Latency (expected/actual in ms)
200 x 20	200 (download) / 20 (upload)	200.5 (download) / 20.5 (upload)	10 ms / 4 ms

As noted above, CPWS does not have any usage-based fees or charges for bandwidth usage. If a customer terminates service prior to the end of the service term, CPWS will charge for the entirety of the unfulfilled contract term.

CATEGORY 3: Commercial Terms

Rates and Terms:

Specific service fees and rates for an individual subscriber are set forth in the subscriber’s terms of service. Information regarding our Internet Services, including additions, changes or modifications are also publicized on the CPWS Powernet web site at:
<https://cpws.com/powernet/>

CPWS does not have any usage-based fees or charges for bandwidth usage. If a customer terminates service prior to the end of the service term CPWS will charge for the entirety of the unfulfilled contract term.

Privacy policies:

Personal information you provide to CPWS is governed by CPWS’ privacy policy, available at <https://cpws.com/about/>. CPWS does not intentionally inspect or store any network traffic.

Redress options:

For questions, complaints or requests for additional information about CPWS’ Internet Services or regarding any of the information set forth above, please contact a customer service representative at 931-388-4833 for technical support concerning Internet Service issues.

The FCC has established procedures for addressing informal and formal complaints regarding broadband service. For information concerning these formal and informal complaint procedures, please refer to the FCC’s website at <http://www.fcc.gov/guides/getting-broadband>.