

**Nebraska Central Telephone Company
Nebraska Central Telecom, Inc.
Network Management Practices Policy
June 1, 2018**

Pursuant to the Federal Communications Commission's Open Internet Rules found in Part 8 of Title 47 of the Code of Federal Regulations and the Guidance on Open Internet Transparency Rule Requirements (GN Docket No. 14-28), the policies of Nebraska Central Telephone Company and Nebraska Central Telecom, Inc., collectively known as "NCTC" regarding network management practices, performance characteristics, and commercial terms are provided so that our current customers, prospective customers, third-party content providers and other interested parties can make informed choices regarding the broadband Internet access services offered by NCTC, and the extent our network management practices may affect those services.

Network Management Practices

In the interest of providing the best online experience possible for all of our customers, we utilize reasonable network management practices tailored to achieve legitimate network management purposes. Because bandwidth is a limited resource for broadband Internet service providers, it is essential that we reasonably manage our network to promote the use and enjoyment of the Internet by all of our customers. By engaging in reasonable and responsible network management, NCTC prevents our customers from being subjected to the negative effects of spam, viruses, security attacks, network congestion, and other risks that threaten to degrade service. The network management practices employed by NCTC are consistent with industry standards.

Transparency Rules

NCTC does not manage nor implement rules regarding traffic blocking, throttling, affiliate prioritization, or paid prioritization.

Congestion Management

NCTC does not employ any congestion management tools, practices and/or software on network traffic.

Application-Specific Behavior

NCTC utilizes the following application-specific network management practices:

Default Blocking of RFC 1918 and RFC 4193 Private networks from entering the network from the Internet.

Device Attachment Rules

In order for a device to be approved for use on the NCTC network, the device must conform to publicly available industry standards and be non-harmful to our network.

Security

NCTC offers its customers unrestricted access to all of the lawful content, services, and applications available on the Internet. We use industry standard tools and generally accepted best practices and policies to protect customers from spam, phishing, and other unwanted or harmful online content and activities. In the instances where these tools and policies identify online content as harmful or unwanted, the content may be prevented from reaching customers, or customers may be permitted to identify or inspect content to determine if it is harmful or unwanted.

To ensure added security protection for network users, NCTC has SecureIT services available for a monthly fee. The SecureIT services available include protection against computer viruses and spyware, pop-up blockers, parental controls, personal firewalls and PC cleanup.

The security measures employed by NCTC to prevent the spread of viruses, malware, spam, harmful and unwanted content or other threats to consumers do not prevent end-users from running any applications.

Performance Characteristics

NCTC offers broadband Internet access service via Digital Subscriber Line (“DSL”) and Fiber to the Premise (FTTx). DSL is a wireline transmission technology that transmits data faster over traditional copper telephone lines already installed to homes and businesses. FTTx is a transmission technology that transmits data and telephone service over fiber optic cable.

The advertised speed of our Internet service is the maximum speed achievable with the technology utilized by NCTC. While the maximum advertised speed is attainable for end users, several factors may affect the actual speed of our Internet service offerings, including, but not limited to: the service tier subscription, the distance of the consumer’s home or office from NCTC’s central office (*i.e.*, the further away the customer is from the central office, the slower the broadband speed), the end user’s computer, modem or router, activity during peak usage periods, and other Internet traffic.

Based on internal testing using NCTC’s web-based speed test site located at <http://www.nctc.net/stest> the mean upload and download speeds are 91-94% of the advertised maximum speed during peak usage periods (*i.e.*, between 7:00 p.m.

and 11:00 p.m. on weeknights). NCTC's internal testing, established a mean round trip latency of 20ms.

The actual speeds achieved with NCTC's Internet service offering make our Internet service suitable for real-time applications, such as video conferencing.

NCTC does not offer any non-broadband Internet access service data services.

Commercial Terms

Pricing

In order to meet the usage and budgetary needs of our customers, NCTC offers a wide selection of broadband Internet access plan options, which may include promotional offerings, bundled service choices, and ala carte alternatives.

To see our current promotions and pricing on broadband Internet access service, please visit our website <http://www.nctc.net> or call 888-873-6282 to speak with a customer service representative.

Early Termination Fees

If a customer previously entered into a service agreement with NCTC for broadband Internet access service for a defined service term, and customer desires to terminate the service agreement prior to the expiration of that term, we may charge a reasonable early termination fee that was detailed when the term agreement was entered. The early termination fee is based upon installation, equipment and/or monthly service discounts provided as a result of the customer's subscription to a term plan.

Usage-Based Fees

NCTC's Internet service is priced on a flat-fee basis (plus any applicable fees, taxes or regulatory surcharges). We do not currently charge broadband end users a usage-based fee for Internet access service.

Privacy Policy

NCTC affords full access to all lawful content, services and applications available on the Internet and does not routinely monitor, inspect or store the network activity and traffic of its Internet service users. However, we reserve the right to monitor bandwidth, usage, transmissions and content for purposes of protecting the integrity of the network and our Internet access service through reasonable network management practices. Further, as part of its network management practices, we do not distribute information on network activity and/or traffic to any

third party, or use network traffic information for any non-network management purpose, except when required to by law.

We may collect equipment information to identify the equipment customer is using to access the network, including, but not limited to: equipment type, serial number, settings, configuration and software. NCTC may also collect performance information to examine the operation of the equipment, services and applications the customer may use on the network, including, but not limited to: IP addresses, URLs, data transmission rates and latencies, location information, security characteristics, and information about the amount of bandwidth and other network resources customer is using in connections with uploading, downloading or streaming data to and from the Internet.

Network traffic, activity, performance information, and equipment information monitored or collected by NCTC is done so for the sole purpose of reasonable network management purposes.

NCTC is required to comply with relevant laws, regulations and governmental requests. Information covered under this Privacy Policy, as well as other categories of information, may be disclosed to third parties if NCTC determines, in its sole discretion, that such a disclosure is necessary or required. We may also disclose this information if, in its sole discretion, such a disclosure is necessary or required to protect our interests or the interests of our customers. NCTC may also disclose this information in connection with administrative operation of the business.

NCTC's network management practices as discussed herein are intended solely to provide the best online experience possible for customers by safeguarding our network and its users from spam, viruses, phishing, and other unwanted or harmful online content and activities. Our network management practices are not intended, nor implemented, to block consumers from accessing the content and applications of their choice, deprive consumers of their entitlement to competition, or discriminate against or in favor of certain network traffic. End users with questions, concerns or complaints regarding NCTC's network management practices are encouraged to contact NCTC for issue resolution.

Redress Options or to Contact Us

If you have any questions regarding our Network Management Practices Policy or would like to file a complaint with NCTC regarding its network management practices, please contact us at:

Nebraska Central Telephone Company
Attn: Customer Service
PO BOX 700 Gibbon NE 68840-0700

888-873-6282
Fax – 308-468-9929
customer-service@nctc.net
<http://www.nctc.net>

If you believe that NCTC is in violation of the FCC's Open Internet Rules, you may file a complaint with the FCC.

<http://esupport.fcc.gov/complaints.htm>

Additional Disclaimers

The Open Internet Rules, as adopted, and our Network Management Practices Policy 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 providers, rights holders, and end users.

Furthermore, the Open Internet Rules, as adopted, and our Network Management Practices Policy do not prohibit NCTC from making reasonable efforts to address the transfer of unlawful content or unlawful transfers of content.

For additional information, please review NCTC's Acceptable Internet Use Policy/Subscriber Agreement at: <http://www.nctc.net/agreement.pdf>