

# SOUTHWEST ARKANSAS TELEPHONE COOPERATIVE

## NETWORK TRANSPARENCY STATEMENT

Southwest Arkansas Telephone Cooperative (“SWATCO” or “Company”) provides this Network Transparency Statement in accordance with the FCC’s Restore Internet Freedom Rules to ensure that you have sufficient information to make informed choices about the purchase of broadband services. Information about SWATCO’s other policies and practices concerning broadband are available at [www.swat.coop](http://www.swat.coop) (“SWATCO Website”).

SWATCO engages in network management practices that are tailored and appropriate for achieving optimization on the network considering the particular network architecture and technology of its broadband Internet access service. SWATCO’s goal is to ensure that all of its customers experience a safe and secure broadband Internet environment that is fast, reliable and affordable. SWATCO wants its customers to indulge in all that the Internet has to offer, whether it is social networking, streaming videos and music, to communicating through email and videoconferencing.

SWATCO’s network management includes congestion- and security-protocol-management and customers generally will not be impacted by the protocols and practices that SWATCO uses to manage its network.

### **A. SWATCO’s Network Transparency Disclosures**

SWATCO uses various tools and industry standard techniques to manage its network and deliver fast, secure and reliable Internet service. SWATCO believes in full transparency and provides the following disclosures about its network management practices:

- 1. Blocking:** SWATCO does not block or discriminate against lawful content.
- 2. Throttling:** SWATCO does not throttle, impair or degrade lawful Internet traffic.
- 3. Affiliated Prioritization:** SWATCO does not prioritize Internet traffic and has no plans to do so.
- 4. Paid Prioritization:** SWATCO has never engaged in paid prioritization. We don’t prioritize Internet for consideration to benefit particular content, applications, services or devices. SWATCO does not have plans to enter into paid prioritization deals to create fast lanes.

5. **Congestion Management:** SWATCO monitors the connections on its network in the aggregate on a continuous basis to determine the rate of utilization. If congestion emerges on the network, SWATCO will take the appropriate measures to relieve congestion.

On SWATCO'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 if instances of congestion do occur on SWATCO's network.

Customers using conduct that abuses or threatens the SWATCO network or which violates the company's Acceptable Use Policy, Internet service Terms and Conditions, or the Internet Service Agreement 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.

SWATCO'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. SWATCO's network management practices do not relate to any particular customer's aggregate monthly data usage.

SWATCO monitors its network on a continuous basis to determine utilization on its network. SWATCO also checks for abnormal traffic flows, network security breaches, malware, loss, and damage to the network. If a breach is detected or high volume users are brought to light by complaint, SWATCO provides notification to the customer via email or phone. If a violation of SWATCO's policies has occurred and such violation is not remedied, SWATCO will seek to suspend or terminate that customer's service.

6. **Application-Specific Behavior:** Except as may be provided elsewhere herein, SWATCO does not currently engage in any application-specific behaviors on its network. Customers may use any lawful applications with SWATCO.

7. **Device Attachment Rules:** Customers must use DHCP for access network IP assignments on the network. For best results, DSL modems, wireless modems, or other proprietary network gateways used on the SWATCO broadband network should be provided by SWATCO. Customers may attach devices of their choosing to their modems, including wired or wireless routers, laptops, desktop computers, video game systems, televisions, or other network-enabled electronics equipment. However, **customers** are responsible for ensuring that their equipment does not harm SWATCO's network or impair the service of other customers. SWATCO is not responsible for the functionality or compatibility of any equipment provided by its customers. Customers are responsible for securing their own equipment to prevent unauthorized access to SWATCO's broadband network by third parties and will be held responsible for the actions of such third parties who gain unauthorized access through unsecured customer equipment.
  
8. **Network Security:** SWATCO 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 protections from such threats as spam, viruses, firewall issues, and phishing schemes. SWATCO also deploys spam filters in order to divert spam from an online customer's email inbox into a quarantine file while allowing the customer to control which emails are identified as spam. Customers may access the spam files through the email. Spam files are automatically deleted if not accessed within 14 days.

As its normal practice, SWATCO does not block any protocols, content or traffic for purposes of network management, but SWATCO 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.

## **B. Network Performance**

### **1. Service Descriptions**

SWATCO deploys Internet access to its subscribers through hardwired broadband access (DSL or Fiber) as well as wireless services depending on market location.

### **2. Network Performance**

SWATCO makes every effort to support advertised speeds and will dispatch repair technicians to customer sites to perform speed tests as needed to troubleshoot and resolve speed and application performance caused by SWATCO's network. SWATCO measures availability, latency, and aggregate utilization on the network and strives to meet internal service level targets.

However, the bandwidth speed at which a particular distant website or other Internet resources may be downloaded, or the speed at which your customer information may be uploaded to a distant website or Internet location is affected by factors beyond SWATCO's control, including the speed of the connection from a distant web server to the Internet, congestion on intermediate networks, and/or limitations on your own computer equipment, including a wireless router. In addition, your service performance may be affected by the inside wiring at your premise. Accordingly, you, the customer, must consider the capabilities of your own equipment when choosing a SWATCO broadband service. Your computers and/or wireless or other networks in your homes or offices may need an upgrade in order to take full advantage of the chosen SWATCO broadband plan.

For the wireless service, SWATCO measures Bit Error Rate (BER) and the Received Signal Strength Indicator (RSSI) parameters for transmission rates, latency, and traffic every 15 min. For DSL, Fiber and T1 service, SWATCO measures traffic every 5 min. All services are best effort.

SWATCO tests each service for actual and expected access speeds at the time of network installation to demonstrate that the service is capable of supporting the advertised speed. Customers may also test their actual speeds using the speed test located at <http://swat.speedtest.net> on SWATCO's website and may request assistance by calling our business office at 870-653-8222.

Based on the network information SWATCO receives from its monitoring efforts, SWATCO's network is delivering data transmission rates advertised for the different high-speed Internet services. To be sure, SWATCO has implemented a program of testing the performance of its network by using a test protocol similar to the one sanctioned by the FCC. We installed specific network performance monitoring equipment at aggregation points across our network and conducted a series of tests using this equipment. SWATCO reports the results of this testing below. This result applies to both upload and download data rates, and applies for measurements made both at peak times and over a 24-hour period:

## DOWNLOAD & UPLOAD SPEEDS, LATENCY

### DOWNLOAD SPEEDS

SPEED TIER	MEASURED (PEAK TIMES)	MEASURED (OFF-PEAK TIMES)
DSL 10Mb / 768k	9.75 Mb	9.75 Mb
DSL 20Mb / 768k	20.26 Mb	20.26 Mb
Fiber 100Mb/100Mb	120.06 Mb	120.06 Mb
Fiber 200Mb/200Mb	216.95 Mb	216.95 Mb
Fiber 500Mb/500Mb	510 Mb	510 Mb
Fiber 1Gb/1Gb	890 Mb	890 Mb

### UPLOAD SPEEDS

SPEED TIER	MEASURED (PEAK TIMES)	MEASURED (OFF-PEAK TIMES)
DSL 10Mb / 768k	720 kb	720 kb
DSL 20Mb / 768k	720 kb	720 kb
Fiber 100Mb/100Mb	120.06 Mb	120.06 Mb
Fiber 200Mb/200Mb	216.95 Mb	216.95 Mb
Fiber 500Mb/500Mb	510 Mb	510 Mb
Fiber 1Gb/1Gb	890 Mb	890 Mb
DSL 10Mb / 768k	9.75 Mb	9.75 Mb

### LATENCY

SPEED TIER	LATENCY (PEAK TIMES)	LATENCY (OFF-PEAK TIMES)
DSL 10Mb / 768k	34.33	34.33
DSL 20Mb / 768k	31.32	31.32
Fiber 100Mb/100Mb	12	12
Fiber 200Mb/200Mb	12	12
Fiber 500Mb/500Mb	12	12
Fiber 1Gb/1Gb	12	12

### **3. Impact of Non-BIAS Data Services**

The Company offers IP video service to end-users. This non-BIAS data service does not adversely affect the last-mile capacity available for the Company's broadband Internet access services, or the performance of such services. Customer should note that significantly heavier use of non-BIAS services (particularly IP video services) may impact the available capacity for and/or the performance of its broadband Internet access services. The Company will monitor this situation, and appreciates feedback from its customers.

### **C. Commercial Terms**

Pricing and additional service information may be found at <http://www.swat.coop>.

In addition to this Network Transparency Statement, patrons may also find links to the following on the SWATCO Website:

- [http://www.swat.coop/files/SWAT Allowable Use Policy-AUP.pdf](http://www.swat.coop/files/SWAT%20Allowable%20Use%20Policy-AUP.pdf)
- For questions, complaints or requests for additional information, please contact SWATCO at:

Business Office at (870) 653-8222