

Wilkes Communications, Inc. **Network TRANSPARENCY Statement**

Wilkes Communications, Inc. (“Wilkes” or “Company”) provides this Network Transparency Statement in accordance with the FCC’s Restore Internet Freedom Rules to ensure you have sufficient information to make informed choices about the purchase of broadband services. Information about Wilkes’ other policies and practices concerning broadband are available at www.wilkes.net (“Wilkes Website”).

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

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

A. Wilkes' Network Transparency Disclosures

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

- 1. Blocking:** Wilkes does not block or discriminate against lawful content.
- 2. Throttling:** Wilkes does not throttle, impair, or degrade lawful Internet traffic.
- 3. Affiliated Prioritization:** Wilkes does not prioritize Internet traffic and has no plans to do so.
- 4. Paid Prioritization:** Wilkes has never engaged in paid prioritization. We don’t prioritize Internet for consideration to benefit particular content, applications, services, or devices. Wilkes does not have plans to enter into paid prioritization deals to create fast lanes.
- 5. Congestion Management:** Wilkes monitors the connections on its network in the aggregate on a daily basis to determine the rate of utilization. If congestion emerges on the network, Wilkes will take the appropriate measures to relieve congestion.

On Wilkes' 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 Wilkes' network.

Customers using conduct that abuses or threatens the Wilkes 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.

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

Wilkes monitors its network on a regular basis to determine utilization on its network. Wilkes 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, Wilkes provides notification to the customer via email or phone. If a violation of Wilkes' policies has occurred and such violation is not remedied, Wilkes will seek to suspend or terminate that customer's service.

6. **Application-Specific Behavior:** Except as may be provided elsewhere herein, Wilkes does not currently engage in any application-specific behaviors on its network. Customers may use any lawful applications with Wilkes.
7. **Device Attachment Rules:** Customers may be required to use PPPoE for authentication of point to point connections between devices on the network. There is a limit of one (1) PPPoE session per account. For best results, DSL modems, wireless modems, or other proprietary network gateways used on the Wilkes broadband network should be provided by Wilkes. 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 Wilkes' network or impair the service of other customers. Wilkes 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 Wilkes' 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:** Wilkes 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. Wilkes 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 30 days.

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

Wilkes deploys Internet access to its subscribers through fiber optic, DSL, cable/coax, and fixed wireless.

2. Network Performance

Wilkes makes every effort to support advertised speeds and will offer technical assistance in ensuring service delivery. If a customer is unable to resolve their speed issue, Wilkes may dispatch repair technicians to customer sites to perform speed tests as needed to troubleshoot and resolve speed and application performance caused by Wilkes' network. Wilkes 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 Wilkes' 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 Wilkes 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 Wilkes broadband plan.

For the wireless service, Wilkes 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, Wilkes measures traffic every 5 min. All services are best effort.

Wilkes 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://speedtest.wilkes.net> on Wilkes' website and may request assistance by calling our business office at 336-973-3103 or by email at rsinfo@myriverstreet.net.

Based on the network information Wilkes receives from its monitoring efforts, Wilkes' network is delivering data transmission rates advertised for the different high-speed Internet services. To be sure, Wilkes 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. Wilkes 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

Download Speeds

ADVERTISED	ACTUAL SUSTAINED	PERCENTAGE DIFFERENTIAL
3 Mbps	3 Mbps	0%
10 Mbps	10 Mbps	0%
25 Mbps	25 Mbps	0%

Upload Speeds

ADVERTISED	ACTUAL SUSTAINED	PERCENTAGE DIFFERENTIAL
25 Mbps	25 Mbps	0%
50 Mbps	50 Mbps	0%
100 Mbps	100 Mbps	0%
250 Mbps	250 Mbps	0%
1 Gig	1 Gig	

3. Impact of Non-BIAS Data Services

The FCC has defined Non-Broadband Internet Access Services (Non-BIAS) to include services offered by broadband providers that share capacity with Broadband Internet Access Services (BIAS) (previously known as “Specialized Services”) also offered by the provider over the last-mile facilities. At this time, Wilkes is not offering any non-BIAS data services.

Alternative Language if Company is offering Non-BIAS services:

Real time services, such as Non-BIAS services, include Voice over Internet Protocol (VoIP) and Internet Protocol (IP) video services, command optimal bandwidth. As Non-BIAS traffic is combined with general Internet traffic on Wilkes' network, broadband customers could experience service delays, although very unlikely, if there is an occurrence of congestion on Wilkes' network. In any such event, the Non-BIAS traffic is given priority over general Internet traffic.

Example VoIP Non-BIAS data service Language:

Wilkes provides Voice-over-the-Internet-Protocol (VoIP) to its fixed wireless customers. The VoIP traffic uses private RFC 1918 addresses, dedicated paths for VoIP and QoS on the routers/switches it touches. The QoS priority is based on the source and destination IP. Where VoIP traffic is combined with best effort Internet traffic and QoS priority is employed, the network could endure marginal delays if there are instances of bandwidth contention, although very unlikely.

Example IP Video Non-BIAS data services Language:

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 [here](#).

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

- [Privacy Policy](#)
- [Frequently Asked Questions \(“FAQs”\)](#)
- [Acceptable Use Policy](#)

For questions, complaints or requests for additional information, please contact Wilkes at: Business Office at 336-973-3103 | Email at wilkesinfo@wilkes.net