

## **Randolph Telephone Membership Corporation** **Network Transparency Statement**

Randolph Telephone Membership Corporation, dba Randolph Communications, and Randolph Telephone Telecommunications, Inc. (collectively “Randolph” 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 Randolph’ other policies and practices concerning broadband are available at [www.rtmc.net](http://www.rtmc.net) (“Randolph Website”).

Randolph 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. Randolph’ goal is to ensure that all of its customers experience a safe and secure broadband Internet environment that is fast, reliable and affordable. Randolph 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.

Randolph will not unjustly or unreasonably prevent or interfere with competition among Content, Applications, Service, or Device Providers.

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

### **A. Randolph’ Network Transparency Disclosures**

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

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

5. **Congestion Management:** Randolph 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, Randolph will take the appropriate measures to relieve congestion.

On Randolph' 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 Randolph' network.

Customers using conduct that abuses or threatens the Randolph 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.

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

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

6. **Application-Specific Behavior:** Except as may be provided elsewhere herein, Randolph does not currently engage in any application-specific behaviors on its network. Customers may use any lawful applications with Randolph.
7. **Device Attachment Rules:** For best results, DSL modems, wireless modems, or other proprietary network gateways used on the Randolph broadband network should be provided by Randolph. 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 Randolph' network or impair the service of other customers. Randolph 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 Randolph' 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:** Randolph 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. Randolph 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, Randolph does not block any protocols, content or traffic for purposes of network management, but Randolph 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**

Randolph deploys Internet access to its subscribers through hardwired broadband access through Fiber-to-the-Home and copper facilities.

### **2. Network Performance**

Randolph 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 Randolph' network. Randolph 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 Randolph' 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 Randolph 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 Randolph broadband plan.

For DSL, Fiber and T1 service, Randolph measures traffic every 5 min. All services are best effort. Randolph 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 [SpeedTest](#) on Randolph' website and may request assistance by calling our business office at 336.879.5684 or by email at [csrep@rtmc.net](mailto:csrep@rtmc.net).

Based on the network information Randolph receives from its monitoring efforts, Randolph' network is delivering data transmission rates advertised for the different high-speed Internet services. Randolph conducts internal testing and in the coming months will be participating in the FCC's Broadband Testing as those requirements become effective.

### **DOWNLOAD & UPLOAD SPEEDS, LATENCY**

#### **DOWNLOAD SPEEDS**

<b>SPEED TIER</b>	<b>MEASURED (PEAK TIMES) 7:15 p.m.</b>	<b>MEASURED (OFF-PEAK TIMES)</b>
<b>1.5 Mbps</b>	<b>1.6 mbps</b>	<b>1.6 mbs</b>
<b>3.0 Mbps</b>	<b>4.0 mbps</b>	<b>3.9 mbps</b>
<b>6.0 Mbps</b>	<b>6.1 mbps</b>	<b>5.9 mbps</b>
<b>8.0 Mbps</b>	<b>8.7 mbps</b>	<b>8.5 mbps</b>
<b>15 Mbps</b>	<b>15.2 mbps</b>	<b>15.8 mbps</b>
<b>25 Mbps</b>	<b>25.9 mbps</b>	<b>26.1 mbps</b>
<b>50 Mbps</b>	<b>49.6 mbps</b>	<b>49.6 mbps</b>
<b>100 Mbps</b>	<b>96.5 mbps</b>	<b>96.2 mbps</b>
<b>200Mbps</b>	<b>190.9 mbps</b>	<b>193.4 mbps</b>

#### **UPLOAD SPEEDS**

<b>SPEED TIER</b>	<b>MEASURED (PEAK TIMES)</b>	<b>MEASURED (OFF-PEAK TIMES)</b>
<b>3 Mbps</b>	<b>3.2 mbps</b>	<b>3.0 mbps</b>
<b>5 Mbps</b>	<b>5.3 mbps</b>	<b>5.2 mbps</b>
<b>10 Mbps</b>	<b>10.4 mbps</b>	<b>10.0 mbps</b>
<b>20 Mbps</b>	<b>21.2 mbps</b>	<b>19.7 mbps</b>
<b>25 Mbps</b>	<b>26.4 mbps</b>	<b>24.2 mbps</b>

#### **LATENCY**

<b>SPEED TIER</b>	<b>LATENCY (PEAK TIMES)</b>	<b>LATENCY (OFF-PEAK TIMES)</b>
<b>1.5Mbps/768Kbps</b>	<b>5ms</b>	<b>2ms</b>
<b>3.0Mbps/768Kbps</b>	<b>4ms</b>	<b>2ms</b>

<b>6.0Mbps/768Kbps</b>	<b>4ms</b>	<b>3ms</b>
<b>8.0/2Mbps</b>	<b>4ms</b>	<b>2ms</b>
<b>15/3 Mbps</b>	<b>4ms</b>	<b>2ms</b>
<b>25/5 Mbps</b>	<b>4ms</b>	<b>3ms</b>
<b>50/10 Mbps</b>	<b>5ms</b>	<b>2ms</b>
<b>100/20 Mbps</b>	<b>4ms</b>	<b>2ms</b>
<b>200/25 Mbps</b>	<b>4ms</b>	<b>2ms</b>

<b>SPEED TIER</b>	<b>PING</b>	<b>DOWN</b>	<b>UP</b>
<b>1.5Mbps/768Kbps</b>	<b>20ms</b>	<b>1.52</b>	<b>.59</b>
<b>3.0Mbps/768Kbps</b>	<b>111ms</b>	<b>3.89</b>	<b>.94</b>
<b>6.0Mbps/768Kbps</b>	<b>67ms</b>	<b>5.76</b>	<b>.94</b>
<b>8.0/2Mbps</b>	<b>23ms</b>	<b>8.86</b>	<b>1.83</b>
<b>15/3 Mbps</b>	<b>16ms</b>	<b>15.73</b>	<b>3.05</b>
<b>25/5 Mbps</b>	<b>66ms</b>	<b>25.58</b>	<b>4.98</b>
<b>50/10 Mbps</b>	<b>16ms</b>	<b>50.22</b>	<b>10.39</b>
<b>100/20 Mbps</b>	<b>16ms</b>	<b>92.85</b>	<b>20.74</b>
<b>200/25 Mbps</b>	<b>16ms</b>	<b>123.48</b>	<b>26.33</b>

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

The FCC has defined two types of broadband services: Broadband Internet Access Service (“BIAS”) and Non-Broadband Internet Access Service (“Non-BIAS”) service. BIAS 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. Non-BIAS services include services offering connectivity to one or a small number of Internet endpoints for a particular device (i.e. heart monitors) or don’t provide access to the internet at all. Non-BIAS (previously known as “Specialized Services”) may share capacity with BIAS over the last-mile facilities. If both are offered, they may compete for bandwidth in the last mile.

Randolph Real time services, such as Non-BIAS, 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 Randolph’ network, broadband customers could experience service delays, although very unlikely, if there is an occurrence of congestion on Randolph’ network. In any such event, the Non-BIAS traffic is given priority over general Internet traffic.

Randolph provides Voice-over-the-Internet-Protocol (VoIP) to its 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.

### C. Commercial Terms

#### **Randolph Communications**

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 Randolph Communications Website:

- [Privacy Policy](#)
- [Acceptable Use Policy](#)

#### **Randolph Telephone Telecommunications, Inc. (“RTTI”)**

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 RTTI Website:

- [Privacy Policy](#)
- [Acceptable Use Policy](#)

For questions, complaints or requests for additional information, please contact Randolph at:

Business Office: 336.879.5684

Email: [csrep@rtmc.net](mailto:csrep@rtmc.net)