



COMPLIANCE STATEMENT AND DISCLOSURES FOR FCC “TRANSPARENCY RULE”

Twin Valley (the “Company”) provides this information in its good faith effort to comply with the disclosures required by the Federal Communications Commission (“FCC”) revised “transparency” rule effective on June 11, 2018. In this regard, we endeavor through these disclosures to provide consumers with information necessary for them to make informed choices about the purchase and use of the Company’s broadband Internet access service (the “Company’s Service”).

To place our compliance efforts in context, the FCC transparency rule states as follows:

1. Any person providing broadband Internet access service shall publicly disclose accurate information regarding the network management practices, performance characteristics, and commercial terms of its broadband Internet access services sufficient to enable consumers to make informed choices regarding the purchase and use of such services and entrepreneurs and other small businesses to develop, market, and maintain Internet offerings. Such disclosure shall be made via a publicly-available, easily-accessible website or through transmittal to the Commission.
2. Broadband Internet access service 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, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service. This term also encompasses any service that the Commission finds to be providing a functional equivalent of the service described in the previous sentence or that is used to evade the protections set forth in this part. 83 Fed. Reg. 7852, 7922 (Feb. 22, 2018) to be codified at 47 C.F.R. §8.1(b).
3. A network management practice is reasonable if it is appropriate and tailored to achieving a legitimate network management purpose, taking into account the particular network architecture and technology of the broadband Internet access service. 83 Fed. Reg. 7852, 7922 (Feb. 22, 2018) to be codified at 47 C.F.R. §8.1(c).

The Company reserves the right to update and modify these disclosures and the underlying policies, in a manner consistent with the FCC’s directives, including by way of example the Company’s terms and conditions, network management practices and performance characteristics. To the extent such changes are made they will be reflected in the links provided below.

COMMERCIAL TERMS

The terms and conditions associated with the Company’s Service, including by way of example only, early termination and/or additional network service fees, can be accessed via the following links:

Terms and Conditions:

- Acceptable Use Policy - Internet Subscriber Agreement – <https://cbd-dev.com/twinvalley/wp-content/uploads/2023/05/TVT-Acceptable-Use-Policy-040620.pdf>
- Payment Terms – <https://cbd-dev.com/twinvalley/wp-content/uploads/2023/05/TVT-Payment-Terms-040120.pdf>
- Termination Policy – <https://cbd-dev.com/twinvalley/wp-content/uploads/2023/05/TVT-Termination-Policy-0719.pdf>
- Wireline Broadband Internet Transport Service – <https://cbd-dev.com/twinvalley/wp-content/uploads/2023/05/TVT-WBITS-RTC-2021-Revised-12.15.22.pdf>

When changes are made to the rates, terms, and conditions of the Company's Service, we will post them on our website using the links referenced above. The Company's policies and agreements can also be accessed on the Company's website at the following link: <https://cbd-dev.com/twinvalley/policies/>

The Company's "Privacy Policies" can be accessed via the following links <https://cbd-dev.com/twinvalley/privacy-policy/>

If you believe that the Company's Service is not meeting the rates, terms, and conditions applicable to what you have ordered, please feel free to contact us so that we can address your concern:

Via Telephone 800.515.3311
Monday through Friday, 8:00 a.m. to 5:00 p.m.

Via Email support@twinvalley.net

Via Mail Twin Valley
P.O. Box 515
Clay Center, Kansas 67432

We strongly encourage you to contact us in order to discuss your concerns. If, based on those discussions, there is some remedial action necessary, we can work together to implement it.

NETWORK MANAGEMENT PRACTICES

In offering the Company's Service, the Company recognizes that, at times, network issues will arise, and, during those times, the Company will undertake actions that are appropriate and tailored to achieving a legitimate network management purpose. The Company notes specifically, the following network management practices. Please note that each of the statements below are subject to the Company's "permitted use" policy, available at the following link: <https://cbd-dev.com/twinvalley/wp-content/uploads/2023/05/TVT-Acceptable-Use-Policy-040620.pdf>

1. *Blocking.* The Company does not block or otherwise prevent end-user customer access to lawful content, applications, service, or non-harmful devices.

2. *Throttling.* Except where network congestion may occur, the Company strives to avoid any degradation or impairment of access to lawful Internet traffic on the basis of content, application, service, user, or use of a non-harmful device. Where service congestion occurs, the Company Service's speed may be temporarily reduced.
3. *Affiliated Prioritization.* The Company does not engage in any practice that directly or indirectly favors any of its affiliates' traffic over other traffic.
4. *Paid Prioritization.* The Company does not engage in any practice that directly or indirectly favors some traffic over other traffic in exchange for consideration, monetary or otherwise.
5. *Congestion Management.* The Company monitors the amount of bandwidth on all direct Internet access ("DIA") connections to the upstream provider, ethernet connections between routers and switches, and ethernet connections to peripheral equipment. If the mentioned connections reach 80% of the available bandwidth, electronic notifications are sent, and additional capacity is made available if needed. The DIA circuits are burstable to twice the amount of purchased bandwidth and attempts are made to have twice the capacity needed between routers to ensure traffic congestion is eliminated or kept to a minimum. The DIA circuits also connect with the upstream provider at two different locations, to provide redundancy in the event of a network failure. These measures ensure the end user will have adequate capacity from the customer-facing equipment to the upstream provider.
6. *Application-Specific Behavior.* The Company does not (i) block or rate-control specific protocols or protocol ports; (ii) modify protocol fields in ways not prescribed by the protocol standard; or (iii) otherwise inhibit or favor certain applications or classes of applications.
7. *Device Attachment Rules.* Provided that an attachment does not cause network harm, including by way of example, interference with the Company's network security measures, the Company does not restrict the types of devices that its end user customers may use and attach to the Company's network, nor does it have any approval procedures for devices to connect to the Company's network.
8. *Security.* End users are responsible for protecting their home and business networks, including but not limited to firewalls, virus protection, and securing internal WIFI connections. If an end user is unlawfully compromising the integrity of the Company's network, they may be disconnected and notified. In the event of a Denial of Service ("DoS") or Distributed Denial of Service ("DDoS") attack, the Company's upstream provider will implement inbound and outbound traffic filtering and/or blocking on specific source and destination IP addresses. These actions will be performed to ensure reliability and availability of the Company's network. These actions will not be utilized for normal Internet applications and traffic. In the case of any suspicious or malicious network activity, notification and forensic information will be made available to the appropriate law enforcement and network security resources for investigation.

PERFORMANCE

1. *Service Description.* Descriptions of the Company's Service, including (1) the service technology; (2) expected and actual access speed and latency; and (3) the suitability of the service for real-time applications is set forth below:

Service Description. The Company provides ADSL service using ADSL2+ network equipment, cable modem using DOCSIS 2 and 3 standards, and fiber to the home using optical active Ethernet equipment.

Expected and Actual Transmission Speed and Latency. Based upon internal testing conducted by the Company, the actual expected performance for the Company's service offerings are as follows:

DSL

<u>Service</u>	<u>Download</u>	<u>Upload</u>	<u>Latency</u>
4 Mbps	4 Mbps	1 Mbps	30-60 ms
6 Mbps	6 Mbps	1 Mbps	30-60 ms
12 Mbps	12 Mbps	1 Mbps	30-60 ms
20 Mbps	20 Mbps	1 Mbps	30-60 ms
25 Mbps	25 Mbps	2 Mbps	30-60 ms
25 Mbps	25 Mbps	3 Mbps	30-60 ms
50 Mbps	50 Mbps	10 Mbps	30-60 ms
75 Mbps	75 Mbps	10 Mbps	30-60 ms
Mbps	Mbps		

Cable Modem

<u>Service</u>	<u>Download</u>	<u>Upload</u>	<u>Latency</u>
6 Mbps	6 Mbps	1 Mbps	30-60 ms
12 Mbps	12 Mbps	2 Mbps	30-60 ms
25 Mbps	25 Mbps	3 Mbps	30-60 ms
50 Mbps	50 Mbps	3 Mbps	30-60 ms
100 Mbps	100 Mbps	3 Mbps	30-60 ms
150 Mbps	150 Mbps	3 Mbps	30-60 ms
1 Gbps	1 Gbps	15 Mbps	30-60 ms

Fiber to the Home

<u>Service</u>	<u>Download</u>	<u>Upload</u>	<u>Latency</u>
6 Mbps	6 Mbps	1 Mbps	10-30 ms
12 Mbps	12 Mbps	2 Mbps	10-30 ms
25 Mbps	25 Mbps	3 Mbps	10-30 ms
50 Mbps	50 Mbps	10 Mbps	10-30 ms
75 Mbps	75 Mbps	10 Mbps	10-30 ms
100 Mbps	100 Mbps	10 Mbps	10-30 ms
150 Mbps	150 Mbps	15 Mbps	10-30 ms

250 Mbps	250 Mbps	25 Mbps	10-30 ms
500 Mbps	500 Mbps	50 Mbps	10-30 ms
750 Mbps	750 Mbps	75 Mbps	10-30 ms
1 Gbps	1 Gbps	100 Mbps	10-30 ms
100 Mbps	100 Mbps	100Mbps	10-30 ms
250 Mbps	250 Mbps	250 Mbps	10-30 ms
500 Mbps	500 Mbps	500 Mbps	10-30 ms
750 Mbps	750 Mbps	750 Mbps	10-30 ms
1 Gbps	1 Gbps	1 Gbps	30-60 ms
2 Gbps	2 Gbps	2 Gbps	30-60 ms

Wireless

<u>Service</u>	<u>Download</u>	<u>Upload</u>	<u>Latency</u>
25 Mbps	25 Mbps	5 Mbps	10-30 ms
50 Mbps	50 Mbps	10 Mbps	10-30 ms
75 Mbps	75 Mbps	15 Mbps	10-30 ms
100 Mbps	100 Mbps	20 Mbps	10-30 ms

This information is based upon the mean upload and download speeds in megabits per second during the “busy hour” between 7:00 p.m. and 11:00 p.m. on weeknights.

Suitability for Real-Time Applications. All the Company’s Internet service offerings can be used for real-time applications. However, performance of those applications may improve at higher transmission speeds.

2. *Impact of Non-Broadband Internet Access Service Data Services.* The Company’s Service does not currently include any non-broadband Internet access data services.