



NETWORK MANAGEMENT PRACTICES

(Pursuant to 47 C.F.R. § 8.1 et seq)

Clear Rate Communications, Inc. ("Clear Rate" or "We" or "Us") has developed the following network management practices with respect to its broadband Internet access services in its operating areas. This document is intended to meet the Transparency requirements of the Protecting and Promoting the Open Internet regulations promulgated by the Federal Communications Commission ("Commission") (codified in 47 C.F.R. §§ 8.1, et seq.). This document is in addition to and supplements any other existing terms, policies and procedures relating to services provided by Us. Clear Rate's management practices, as well as the performance characteristics and terms of service, for its broadband internet access services are subject to change. We will provide updates to this document, the most recent version of which is filed with the Commission.

I. Overview

The purpose of this document is to disclose information regarding Clear Rate's network management practices, performance, and commercial terms of its broadband Internet access service (the "Service") sufficient for consumers to make informed choices regarding use of such Service and for content, application, service, and device providers to develop, market, and maintain Internet offerings, consistent with the Commission's Protecting and Promoting the Open Internet regulations. High-speed bandwidth and network resources are limited and managing the network is essential to promote the use and enjoyment of the Internet by all of our customers. We are committed to providing the best online experience possible for all of our customers and uses reasonable network management practices to ensure that the Clear Rate Service is used in ways that are consistent with the specifications of a shared network, and the standards of our local municipalities and the Internet community. We also aim to ensure that the Internet access resources we provide are used in a manner that benefits everyone. The network management practices used by Us are consistent with industry standards. For example, we use tools and practices to reduce the negative effects of spam, viruses or other harmful code or content, security attacks, network congestion, and other risks and degradations of the Service. By engaging in reasonable and responsible network management, We can deliver the best possible broadband Internet experience to all of its customers.

II. Network Practices

- a. Blocking
 - i. We do not block or otherwise prevent end users access to lawful content, applications, service or other non-harmful devices.
- b. Throttling
 - i. We don't throttle, degrade, or impair access to lawful internet traffic on the basis of content application, service, user, or use of a non-harmful device, unless otherwise indicated in this disclosure.
- c. Affiliated prioritization
 - i. VOIP is prioritized over other internet traffic, as long as its identified as such, using DSCP EF. We don't guarantee that third party traffic over the public internet will correctly be able to use DSCP EF as we have no control over the third party's network ability to deliver it to Us.
- d. Paid Prioritization

- i. We do not favor some traffic or other traffic in exchange for consideration, monetary or otherwise.
- e. Congestion Management
 - i. Clear Rate monitors its network on a continual basis to determine if an area of congestion could occur. The area of possible congestion will be identified and network improvements will attempt to be made prior to any congestion occurring. These network improvements may include: the addition of network hardware or network segregation to accommodate additional traffic. If a period of congestion occurs, customers may experience things like: longer times to download or upload files, surfing the Web may seem somewhat slower, or playing games online may seem somewhat sluggish.
 - ii. We do prioritize VOIP traffic when there is congestion to ensure call quality and continuity.
 - iii. We prioritize VOIP and video calling/conferencing as well as control traffic for both when DSCP tags are appropriately applied. The specific tags and their use can be requested from our support team. We are agnostic to the source and destination of this traffic. Any customer may use the appropriate DSCP tags to prioritize their own traffic.
- f. Application Specific Behavior
 - i. Clear Rate does not block P2P traffic or applications like BitTorrent, Gnutella, or others as part of its current network congestion management technique. We do not discriminate against particular types of lawful online content. Clear Rate provides its customers with full access to all the lawful content, services, and applications that the Internet has to offer. However, we are committed to protecting customers from spam, phishing, and other unwanted or harmful online content and activities. In that connection, we use industry standard tools and generally accepted practices and policies to help ensure that our customers are protected from unwanted or harmful content and activities. Clear Rate's use of these tools, techniques and policies help to identify and restrict certain harmful and unwanted online content, such as spam or phishing Web sites. In other cases, these tools, techniques and policies may permit customers to identify certain content that is not clearly harmful or unwanted, such as bulk email or Web sites with questionable security ratings, and enable those customers to inspect the content further if they want to do so.
- g. Device Attachment Rules
 - i. For most services, We supply Clear Rate managed equipment that must be used in combination with the service. In most cases, we do not allow Customer Owned Equipment to directly attach to the network for monitoring and performance purposes. Customers may connect their own equipment at the industry standard handoffs (Ethernet, T1, etc...) this equipment provides.
- h. Security
 - i. Clear Rate employs a number of practices to help prevent unwanted communications such as spam as well as protect the security of our customers and network. Clear Rate limits the number of login, SMTP, DNS, and DHCP transactions per minute (at levels far above "normal" rates) that customers can send to Our servers in order to protect them against Denial of Service (DoS) attacks. We do not disclose the exact rate limits in order to maintain the effectiveness of these measures, which ensure that these critical services are available for all of our customers. In order to further protect our customers, we may block a limited number of ports that are commonly used to send spam, launch malicious attacks, or steal a customer's information, for example, SQL Exploits and Microsoft communication protocol ports in the event of an outbreak. In addition, We conduct several security initiatives, and offer security tools for our customers, such as DoS monitoring, web filtering, and Virus Scanning software.
- i. Impact of Non-Broadband Internet Access Service Data Services
 - 1. Non-broadband does not affect last mile transmission of broadband internet access for our customers.

III. General Pricing Policy

All prices for Clear Rate Internet services are provided to customers at the point of sale and before services are provided to the customer. Our pricing is subject to change. Prices for Clear Rate broadband Internet access services vary by region and often change over time or based on current promotions. Current subscribers can find pricing information concerning their service on their monthly bill, or by contacting a customer service representative. Residential Prospective customers can obtain pricing information for broadband Internet access service by contacting a Clear Rate sales representative or by visiting www.clearrate.com. Business Prospective customers can obtain pricing information for broadband Internet access service by contacting a Clear Rate Business sales representative. Clear Rate typically sells its broadband Internet access service to business customers for a specified term (generally ranging from 1-5 years). Pricing may vary depending upon the length of the agreed upon service term. Customers that agree upon a longer service term may receive more favorable pricing. In most cases, our Business agreements automatically renew for an additional term (usually one year) at the end of the initial term. All of Our prices are subject to change. We offer a variety of service plans in our operating regions, which include pricing for Internet Services that vary depending upon the plan and whether the Internet Services are bundled with other service offerings. In most service areas, Clear Rate offers to its residential customers the option to enter into an agreement with a specified minimum term. Customers that agree upon a minimum term arrangement may receive more favorable pricing. At the end of the minimum term, the agreement will automatically continue (if not terminated) on a month to month basis and pricing will be adjusted to reflect Our then current standard rates. If the Agreement is terminated early by the Customer without cause or by Clear Rate for cause, Early Termination Fess will apply, which is included in the terms and conditions of the offer. We typically agree with our business customers that the agreed upon BIAS pricing will not change for the initial term of our agreement. After the initial term, pricing is subject to change.

IV. Our Privacy Policy can be located at <https://www.clearrate.com/privacy-policy/> .

V. Redress Options

- a. Customers may contact Clear Rate to submit a complaint or ask a question with regard to any aspect of the service by the following means:
 - i. Corporate Phone: 877-877-4410
 - ii. Corporate Fax: 877-877-5225
 - iii. Sales Phone: 877-877-7599
 - iv. Customer Service: 877-877-4799 M-F 7A-10P or on Saturdays 9A-5P
 - v. Repairs: 877-877-3975 or emailing repairs@clearrate.com
 - vi. After Hours Repairs: 877-877-0314
 - vii. Business Sales: 877-877-4899 or emailing bizsales@clearrate.com
 - viii. Mail to the Corporate Office: 2600 W. Big Beaver Rd., Suite 450, Troy, MI 48084
 - ix. Mail regarding billing: PO Box 27308, Lansing, MI 48909
 - x. On our website at www.clearrate.com
 - xi. Emailing support@clearrate.com or info@clearrate.com or complaints@clearrate.com