Transparency Disclosures
City of Tacoma, Dept. of Public Utilities, Light Division dba Click! Network
FRN 0007466642

Type of ISP Service: Click! Network provides wired broadband Internet access service using the Data Over Cable System Interface Specification (DOCSIS) platform, on a wholesale basis for resale by qualified Internet Service Providers

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    Revision 1 - speeds   2/1/2019

Click! Network, a section of Tacoma Power, strives to provide information to customers and end users about all of its services in a transparent manner. Additionally, the Federal Communications Commission (FCC) requires that Click! Network and other providers of broadband Internet access services disclose certain information about those Internet services. The purpose of this document, in addition to the disclosures, terms and conditions posted at www.clickcabletv.com, is to assist consumers in finding the information needed to make an informed decision about which services best meet their needs.

Click! Network operates a network consisting of a fiber optic backbone, fiber optic rings, and a hybrid fiber-coaxial (HFC) distribution system throughout Tacoma, University Place, Fircrest, Fife, and portions of Lakewood and unincorporated Pierce County that fall with the service territory of Tacoma Power, a division of Tacoma Public Utilities owned by the City of Tacoma, Washington. These disclosures will be updated as necessary. Questions can be directed to 253-502-8900 or customercare@click-network.com.

Use of broadband Internet access services on the Click! network is governed by:
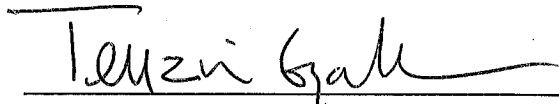>Internet Acceptable Use Policy
>Bandwidth and Network Management Policy
>Open Internet Policy

These policies can be accessed at www.clickcabletv.com/legal-notices. In addition, there may be governing policies published by the Internet Service Provider with whom the end user establishes a service account. Please refer to the ISP's disclosure statements and/or website for those details.

Certification of Filing Accuracy

I, Tenzin Gyaltsen, General Manager of Click! Network, hereby certify that I have examined the information contained in the disclosure and that all information contained in the submission is true and correct to the best of my knowledge, information and belief.

Date: _____

_____
Tenzin Gyaltsen, General Manager

Network Management Practices

General Summary

Click! Network maintains a system on which the Internet is offered to customers, through authorized and trusted third parties, as an open platform providing customer choice with full access to all lawful content, services, sites, platforms, network compatible types of equipment, and applications. The Click! network is designed for usage by typical residential and commercial users of broadband Internet access services. Bandwidth on the network is a limited, shared resource among Click! Network's customers (including commercial customers, carriers and Click! Network Authorized ISPs/resellers and their customers and end-users) and other users of Click! Network's broadband Internet access service. Click! Network actively manages its network to ensure that activity resulting in excessive or sustained bandwidth consumption, which may burden the network and affect other users, is limited. Accordingly, such usage may be restricted.

Click! Network strives to provide users the best experience when using the network and may use tools and techniques to manage its network, deliver the service, and ensure compliance with its policies. These tools and techniques are dynamic, like the network and its usage, and can and do change frequently. For example, these network management activities may include (i) identifying spam and preventing its delivery to user e-mail accounts, (ii) detecting malicious Internet traffic and preventing the distribution of viruses or other harmful code or content, (iii) limiting speeds during periods of extended congestion, (iv) requiring an upgrade or purchase of a different Internet service and (v) using other tools or techniques that Click! Network may be required to implement in order to meet its goal of delivering the best broadband Internet experience to all users.

Click! Network does not:
- Discriminate among specific uses, or class of uses, on its network
- Impair, degrade or delay VoIP applications or services that compete with its video services or services of its affiliates
- Impair, degrade, delay or otherwise inhibit access by customers to lawful content, applications, services or non-harmful devices, subject to reasonable network management
- Impair free expression by slowing traffic from certain web sites
- Demand pay-for-priority or similar arrangements that directly or indirectly favor certain traffic over other traffic
- Prioritize its own applications, services or devices or those of its affiliates
- Block lawful content, applications, services, or non-harmful devices, subject to reasonable network management

With regard to specific disclosures required by the Federal Communications Commission, Click! Network's practices and policies are as follows:

Blocking

Click! Network does not block any lawful content or application, subject to reasonable network management practices and Click! Network's Internet Acceptable Use Policy, Bandwidth and Network Policy, and Open Internet Policy.

Throttling

Click! Network does not discriminate among specific uses, or class of uses, on its network, throttle traffic from certain web sites, or otherwise impair, degrade, delay or otherwise inhibit access by customers to lawful content, applications, services or non-harmful devices, subject to reasonable network management.

Affiliated Prioritization

Click! Network does not prioritize its own applications, services or devices or those of its affiliates.

Paid Prioritization

Click! Network does not prioritize any traffic over its network in exchange for consideration.

Congestion Management

Congestion management on the network is approached from an agnostic perspective and with the objective of ensuring an optimum experience for all users of the network. Click! Network uses industry standard tools and generally accepted best practices to protect its network and customers' experience. Specifically, Click! Network actively monitors activity on its network and takes action as needed to augment capacity, balance usage across network service groups and mitigate excessive use. It is difficult to forecast congestion, so Click! Network cannot describe its frequency; however, Click! Network endeavors to minimize the frequency and extent of congestion to the greatest extent practicable.

The network management tools and techniques employed by Click! Network do not and will not target specific usages or applications (such as peer-to-peer) and instead focus in a content-neutral manner on bandwidth usage in real time, with the goal of providing reasonable and

equitable access to the network for all similarly situated customers. In other words, to the extent that the use of network management practices may affect the performance or other characteristics of Internet service, they are designed to affect all similarly situated customers equally.

Excessive use means bandwidth or data usage that is significantly higher than typical usage for which our network is designed, and will be determined in the sole judgment of Click! Network. Excessive users consume so much data that their usage could negatively impact the service provided to other customers. In order to ensure an optimized Internet experience for all users, data guidelines have been assigned to all Internet services, and are subject to change. Current data usage guidelines are always available at https://www.clickcabletv.com/about/legal-notices/bandwidth-and-network-policy/.

If Click! Network in its sole but reasonable discretion determines that a user has exceeded the Excessive Use threshold or is using the service in a manner significantly uncharacteristic of a typical user of the service to which they have subscribed, Click! Network may (a) adjust, suspend, limit or terminate service at any time and without notice; or (b) require the user to upgrade their service level or pay additional fees in accordance with the ISP's then-current, applicable rates and charges for such service; or (c) use any technology to be chosen by Click! Network at its sole discretion to limit the user's service for purposes of conserving bandwidth.

Residential Package	Package Description	Data Guideline per Billing Cycle
10 Mbps	10 Mbps down/1 Mbps up	300 GB
25 Mbps	25 Mbps down/2 Mbps up	300 GB
50 Mbps	50 Mbps down/5 Mbps up	350 GB
75 Mbps	75 Mbps down/8 Mbps up	400 GB
100 Mbps	100 Mbps down/10 Mbps up	500 GB

Commercial Package	Package Description	Data Guideline per Billing Cycle
10 Mbps	10 Mbps down/2 Mbps up	300 GB
25 Mbps	25 Mbps down/5 Mbps up	400 GB
50 Mbps	50 Mbps down/8 Mbps up	500 GB
75 Mbps	75 Mbps down/10 Mbps up	600 GB
100 Mbps	100 Mbps down/10 Mbps up	800 GB

Application-Specific Behavior

Click! Network does not block or rate control any specific protocols, or modify any protocol field in ways not prescribed by the protocol standard. Certain ports may be blocked in residential packages for the purpose of spam prevention and network security. No functions of the network are designed to inhibit or favor certain applications or classes of applications.

Prioritization is employed in certain Internet package configurations that are designed for voice traffic. The configuration assigns a higher processing priority (QoS) to voice traffic and the cable modem termination system processes that traffic before lesser priority data packets when it detects network congestion. The purpose of this QoS assignment is to maintain voice quality.

Users are expected at all times to comply with Click! Network's Internet Acceptable Use Policy, Bandwidth and Network Policy, and Open Internet Policy, which do prohibit certain activities which the network is not designed to support. For instance, users may not run a server in connection with Click! Network's residential services, nor provide network services to others via Click! Network's residential services. Examples of prohibited uses include, but are not limited to, running servers for mail (pop3 & smtp), http, https, FTP, IRC, DHCP and multi-user interactive forums.

Device Attachment Rules

Click! Network allows devices to be attached to the network that are CableLabs certified DOCSIS 3.0 or higher, that are fully supported for firmware upgrades by the manufacturer, and that do not harm the network.

Security

Click! Network manages its network in an effort to provide an optimum experience for its customers by using industry standard tools and generally accepted best practices and policies to protect its network and customer information. Click! Network reserves the right to utilize network tools and practices to prevent harmful or illegal activity, denial of service attacks, viruses or other malicious code, or transfer of unlawful content including copyright infringing files. Click! Network notifies its Internet Service Provider partners when allegations of such activities are received specific to individual end users, and reserves the right to terminate service to end users without notice for repeated allegations of violations. Click! Network cannot guarantee the prevention of spam, viruses, security attacks, or other actions which can affect service. End users are required to take all necessary steps to secure and manage the use of the services received over the Click! network. To prevent such events, Click! Network monitors its

network and will take active measures to minimize the effects of spam, viruses, security attacks, and other actions which could impact an optimum experience for customers.

Performance Characteristics

Service Description and Performance

Click! Network consists of a system of fiber optic and coaxial cabling and associated equipment that enables provision of broadband Internet access service using the DOCSIS 3.0 specification through a cable modem. Click! operates an Open Access Network, whereby service is delivered to end use customers by qualified third party Internet Service Providers, not by Click! Network. Retail pricing of services is set by the Internet Service Providers and therefore cannot be included in these disclosures. Retail pricing information is available directly from each third-party reseller.

Currently authorized third party resellers include:

Advanced Stream
253-627-8000
www.advancedstream.com
info@advancedstream.com

Rainier Connect
253-683-4100
www.rainierconnect.com
customerservice@rainierconnect.com

As of the effective date of this Disclosure Notice, the following residential services are made available for resale:

Package	Advertised Download	Advertised Upload	Actual Download	Actual Upload	Latency
Ultimate	100 Mbps	10 Mbps	101.9 Mbps	10.6 Mbps	9 ms
Extreme	75 Mbps	8 Mbps	75.2 Mbps	8.5 Mbps	9 ms
Turbo	50 Mbps	5 Mbps	50.6 Mbps	4.9 Mbps	9 ms
Fast	25 Mbps	2 Mbps	25.6 Mbps	1.94 Mbps	10 ms
Standard	10 Mbps	1 Mbps	10.4 Mbps	1.02 Mbps	9 ms

Actual performance measurements were initially collected in July 2018 and again collected in January 2019. These tests were run using a standard laptop with a 1 Gbps interface. The cable modem used for testing was an Arris CM3200 with 32x8 channel bonding capabilities. The tests were performed from an edge point on the network to an external speed test server located in a city about 35 miles from the network.

Impact of Non-Broadband Internet Access Service Data Services

Wholesale commercial Ethernet Data Services up to 10 Gbps are delivered over a separate fiber network for resale by data carriers. Interoperability of the Carrier Ethernet grade of products is certified by the Metro Ethernet Forum (MEF). Other services on the network include transmission of data from certain Internet-connected power meters. These power meters transmit data only within the network, never acquire a public IP address, and transmit data on a frequency separate from the commercial broadband Internet access service traffic. The operation of the power meters and carrier Ethernet product have no impact on the performance of the commercial Internet access products.

Commercial Terms

General Description

Certain Internet services are configured to provide additional features for use by commercial enterprises. The advertised and actual speed performance of the commercial services are the same as the above residential services. Commercial package configurations allow for running mail servers (pop3 and smtp), http and https, FTP, IRC and DHCP. Static IP addresses are included with commercial packages. Retail services are governed by the policies described above and available at www.clickcabletv.com/legal-notices. End users are also bound by the terms of service of the third-party reseller of Click! Network services to which they subscribe.

Prices

As detailed previously, Click! Network offers retail services exclusively through unaffiliated third-party resellers. Pricing information, including monthly prices, usage-based fees, early termination fees, or other costs for additional services, are not within Click! Network's control and therefore are not included in this disclosure.

Privacy Policies

Personally identifiable information of Internet service end users is collected as supplied by the Internet Service Providers for use in providing Services to those end users. This information is not used for any non-network management purposes and is not shared with third parties by Click! Network. As a municipal corporation of the state of Washington, Click! Network is subject to the Washington State Public Records Act (Chapter 42.56, R.C.W.). We may disclose personally identifiable information pursuant to a valid request made under the Public Records Act if and as required to do so by the Act and/or pursuant to a court order, subpoena, civil investigative demand or other legal process.

Click! Network does not inspect or store network traffic, except to the extent network tools associate IP address assignments to individual end users as identified by the Internet Service Provider.

Redress Options

Informal complaints or questions may be directed to 253-502-8900 or customercare@click-network.com. Informal complaints will be investigated and the results will be communicated to the complainant. Formal complaints may be made in writing, including all pertinent information and the complainant's name, address, telephone number and email address (if applicable) and sent to 3628 S. 35th St., Tacoma, WA 98409, or delivered in person to that address during business hours as listed on our website at www.clickcabletv.com. Responses to formal, written complaints will be delivered in writing.