

Docket: Restoring Internet Freedom ISP Disclosures docket, CGB Docket No. 18-142

Proceeding: 18-142

Type of Filing: Compliance Filing

Name of filer: ADT Systems, Inc.

Filer's FCC Registration Number (FRN): 0018795310

Trade name or DBA name under which the described ISP services are offered to consumers:

Rural Texas Broadband

Type of ISP service (e.g., wired, mobile wireless, fixed wireless): Fixed Wireless

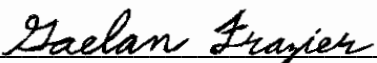
Brief description of service covered by the disclosure: Fixed wireless internet service

The effective date of the disclosure: July 4, 2018

Whether the submission is a new/first-time disclosure or an amendment to a prior submission: First Time Submission

Certification

Gaelan Frazier, Chief Technology Officer of ADT Systems, Inc. hereby certifies that he has examined the information contained in the disclosure and that all information contained in the submission is true and correct.

 07/04/2018

Network Management Practices

Blocking. Any practice (other than reasonable network management elsewhere disclosed) that blocks or otherwise prevents end user access to lawful content, applications, service, or non-harmful devices, including a description of what is blocked.

Answer: RTXBB does not block any specific sites. Our firewalls may automatically block sites if harmful activities are detected. Customers may contact our technical support if they experience blocking to a site that they feel is in error.

Throttling. Any practice (other than reasonable network management elsewhere disclosed) that degrades or impairs access to lawful Internet traffic on the basis of content, application, service, user, or use of a non-harmful device, including a description of what is throttled.

Answer: RTXBB does not throttle users.

Affiliated Prioritization. Any practice that directly or indirectly favors some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, to benefit an affiliate, including identification of the affiliate. **Answer: RTXBB does not prioritize any traffic type.**

Paid Prioritization. Any practice that directly or indirectly favors some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, in exchange for consideration, monetary or otherwise.

Answer: RTXBB does not prioritize any traffic type.

Congestion Management. Descriptions of congestion management practices, if any. These descriptions should include the types of traffic subject to the practices; the purposes served by the practices; the practices' effects on end users' experience; criteria used in practices, such as indicators of congestion that trigger a practice, including any usage limits triggering the practice, and the typical frequency of congestion; usage limits and the consequences of exceeding them; and references to engineering standards, where appropriate.

Answer: RTXBB does not load balance on the basis of customer usage limits. Load balancing is achieved at the network hardware level by monitoring link capacity utilization.

Application-Specific Behavior. Whether and why the ISP blocks or rate-controls specific protocols or protocol ports, modifies protocol fields in ways not prescribed by the protocol standard, or otherwise inhibits or favors certain applications or classes of applications.

Answer: RTXBB does not open any ports. A public IP address is required to reach back into the network from an outside network.

Device Attachment Rules. Any restrictions on the types of devices and any approval procedures for devices to connect to the network.

Answer: RTXBB does not restrict any device types.

Security. Any practices used to ensure end-user security or security of the network, including types of triggering conditions that cause a mechanism to be invoked (but excluding information that could reasonably be used to circumvent network security).

Answer: RTXBB employs industry standard firewall practices. Private IP addresses are required for network access.

Performance Characteristics

Service Description. A general description of the service, including the service technology, expected and actual access speed and latency, and the suitability of the service for real-time applications.

Answer: RTXBB offers high speed internet service via a terrestrial wireless network. Our download speeds range from 1.5 Mbps to 25 Mbps. Speeds are not guaranteed. Typical latency is 20-85 ms which is sufficient for most real-time applications. Specific network latency values are not guaranteed.

Impact of Non-Broadband Internet Access Service Data Services. If applicable, what non-broadband Internet access service data services, if any, are offered to end users, and whether and how any non-broadband Internet access service data services may affect the last-mile capacity available for, and the performance of, broadband Internet access service.

Answer: RTXBB does not offer non-broadband Internet access service data services.

Commercial Terms

Price. For example, monthly prices, usage-based fees, and fees for early termination or additional network services.

Answer:

Plan	Price/Month	Speed
Residential	\$34.95	1.5 down / .25 up
Bronze	\$44.95	3 down / .5 up
Silver	\$54.95	6 down / .75 up
Gold	\$99.95	10 down / 1 up
Platinum	\$114.95	15 down / 1.25 up
Titanium	\$124.95	25 down / 1.5

Standard installation is \$175. Installations requiring mast extensions and custom installations may be more. Some service plans are not available in all service areas. No contract is required, however, a \$100 discount will be applied to the installation if a 1 year contract is signed.

Privacy Policies. A complete and accurate disclosure about the ISP's privacy practices, if any. For example, whether any network management practices entail inspection of network traffic, and whether traffic is stored, provided to third parties, or used by the ISP for non-network management purposes.

Answer: RTXBB does not store or use any information from customers.

Redress Options. Practices for resolving complaints and questions from consumers, entrepreneurs, and other small businesses.

Answer: Questions and complaints from consumers, entrepreneurs and small businesses can be made by phone at 830-267-4142 from 8:00 AM to 5:00 PM Central, Monday through Friday or 24/7 by email to helpdesk@rtxbb.net.