Network Management Policy

WCFiber LLC DBA Upcountry Fiber ("Upcountry Fiber" or "Company") provides this Policy in order to disclose its network management practices in accordance with the FCC's Open Internet Rules and to provide our members and subscribers additional information about Upcountry Fiber's network management practices. Additional Information about Upcountry Fiber's other policies and practices concerning broadband service are also available at www.westcarolina.com under the Internet section, select Legal Disclosures for documentation.

Upcountry Fiber manages its network to ensure that all of its customers experience a safe and secure broadband Internet environment that is fast, reliable and affordable. Upcountry Fiber wants its customers to indulge in all the Internet has to offer, whether it is social networking, streaming videos and music, or communicating through email and videoconferencing.

Upcountry Fiber manages its network for a number of reasons, including optimization, as well as congestion- and security-protocol-management. Such practices are consistent with reasonable network management actions and are intended to improve the overall performance for customers.

Upcountry Fiber's Network Management Practices

Upcountry Fiber uses various tools and industry standard techniques to manage its network and deliver fast, secure and reliable Internet service. Such management tools and practices include the following:

I. Managing Congestion

Upcountry Fiber periodically monitors the connections on its network in the aggregate to determine the rate of utilization. Upcountry Fiber has deployed a non-blocking Internet architecture in the majority of its network. Except of the facilities closest to the customer, the network has redundant facilities on separate links. In addition, Upcountry Fiber has purchased service that allows for bursts of speed. Upcountry Fiber adds capacity when it finds the current facilities are nearing capacity. The facilities closest to the customer are sized to fully meet the advertised bandwidth sold to the customer. Upcountry Fiber may increase capacity by adding Fiber-to-the-home (FTTH) nodes, transport, Internet aggregation routers, and bandwidth, as needed to accommodate additional services and increased speeds.

On Upcountry Fiber's network, all customers have access to all legal services, applications and content online and, in the unlikely 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 occur on Upcountry Fiber's network.

Customers using conduct that abuses or threatens the Upcountry Fiber 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.

Upcountry Fiber's 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. Upcountry Fiber's network management practices do not relate to any particular customer's aggregate monthly data usage. Upcountry Fiber does not prioritize or discriminate

against any applications or protocols except for specialized networks and does not honor quality of service indicators from other carriers.

II. Network Security

Upcountry Fiber 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 providing resources to its customers for identifying and reporting such threats as spam, viruses, firewall issues, and phishing schemes. Upcountry Fiber also deploys spam filters in order to divert spam from an online customer's email inbox while allowing the customer to control which emails are identified as spam. Spam is quarantined in a separate file that the customer may access.

Email in such file will be automatically deleted if not accessed up to 14 days.

As its normal practice, Upcountry Fiber does not block any protocols, content or traffic for purposes of network management except that the company 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. Upcountry Fiber does filter ports to reduce the spread of computer-related viruses and protecting your computer from intruder access. If Upcountry Fiber suspects traffic originated by its customers is virus related, Upcountry Fiber will contact the suspected party. If there is no response, the customer's service will be suspended until the issue can be resolved.

Upcountry Fiber does not currently engage in any application-specific behaviors in its network, except as may be listed in the Specialized Service section of this policy.

III. Monitoring Schedule

Upcountry Fiber has software that monitors the network for performance and provides performance results regularly. Alarms or alerts are generated if the performance is degraded. In addition,

Traffic is analyzed and trended to ensure peak performance. When utilization nears capacity Upcountry Fiber adds additional bandwidth or reroutes traffic to relieve congestion. Upcountry Fiber also uses industry standard software tools to check 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, Upcountry Fiber provides notification to the customer via email or phone. If a violation of Upcountry Fiber's policies has occurred and such violation is not remedied, Upcountry Fiber will seek to suspend or terminate that customer's service.

IV. Network Management Technology

Upcountry Fiber employs a variety of industry-standard tools, applications and devices to monitor, secure and maintain its network, including the following:

- Network graphing solutions
- Latency measurement software
- Bandwidth and performance measurement platforms

V. Service Descriptions

Upcountry Fiber offers broadband service over DSL, and FTTH facilities. Upcountry Fiber offers several different service tiers ranging from 15 Mbps to 8 Gbps. Upcountry Fiber reserves the right to change

service tiers at any time. Not all service tiers are offered on all technologies. Service offerings are detailed in the Internet section of the website upcountryfiber.com/internet.

VI. Network Performance

Upcountry Fiber broadband services are best effort performance. The customer's bandwidth is limited to the maximum of the service tier purchased. Since the vast majority of the network is FTTH and the links are non-blocking, Upcountry Fiber expects their network to deliver the advertised speeds. If the customer does not receive their advertised speeds Upcountry Fiber will dispatch repair technicians to customer sites to perform speed tests as needed to troubleshoot and resolve speed and application performance issues that are caused by Upcountry Fiber's network. Upcountry Fiber measures availability, latency, and aggregate utilization on the network and strives to meet internal service level targets in its network. However, the customer's performance is also affected by the particular website being accessed, capacity in the public Internet beyond the Upcountry Fiber network and the customer's computer, inside wiring, wireless router, and other customer equipment.

Upcountry Fiber is in the process of developing additional systems/processes that will allow us to measure the performance of the Upcountry Fiber controlled network compared to advertised speeds. Once these systems are developed, Upcountry Fiber will disclose the results on its website.

VII. Specialized Services

Upcountry Fiber provides Internet protocol television (IPTV) services to end users. This service, also known as a Specialized Service, is separated from the company's best effort Internet services on the network. Since Specialized Service traffic has dedicated bandwidth that is separated from best effort broadband Internet traffic, our broadband customers will experience no impact on broadband services resulting from Specialized Service traffic.

VIII. Deployment of Passpoint/Hotspot 2.0 Technology

Upcountry Fiber enables Passpoint/Hotspot 2.0 ("Hotspot 2.0") by default on Hotspot 2.0-capable routers that are deployed in customer premises. (This protocol is the underlying wireless standard for SmartTown® managed service ecosystem created by Calix, of which WiFi X is a component.) Hotspot 2.0, which is based on the IEEE 802.11u technical standard, creates a safe, secure and encrypted public aggregated network that is walled off from customers' internal home or business Wi-Fi networks. The Hotspot 2.0 public network serves two functions. First, it is accessible by participating Upcountry Fiber mobile customers on their devices as a complementary part of their service when they're on the go, both inside and outside Upcountry Fiber's service area, with no captive portal or manual login required (for more information about Hotspot 2.0 and SmartTown®, please visit upcountryfiber.com/smarttown). Second, Hotspot 2.0 will make the communities within Upcountry Fiber's service territory safer, as Upcountry Fiber will provide access to first responders, enhancing emergency response capability. Upcountry Fiber customers may opt out of Hotspot 2.0 participation by contacting Upcountry Fiber at 888.760.2111. Upon receipt of an opt-out request, Hotspot 2.0 functionality will be disabled on the customer's router, and customer will no longer be able to access the Hotspot 2.0 network.

IX. Device Attachment Rules

Upcountry Fiber customer may attach any device to the network that meets consumer electronics standards and is not harmful to the network.

X. Other Notices

In addition to this Network Management Policy, other policies and practices concerning broadband service are available at westcarolina.com/legal.

For questions, complaints or requests for additional information, please contact Upcountry Fiber at 888.760.2111.

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