

## Network Management Policy

Northwestern Indiana Telephone Company and FBN, Inc d/b/a NITCO (or Company) provides this Policy in order to disclose its network management practices in accordance with the FCC's Open Internet Rules. Additional information about NITCO's other policies and practices concerning broadband service are also available under the NITCO Company Policy Section of the website.

NITCO manages its network to ensure that all of its customers have access to a safe and secure broadband Internet environment that is fast, reliable and affordable. NITCO wants its customers to enjoy all that the Internet has to offer, whether it is social networking, streaming videos and music, or communicating through email and video conferencing.

NITCO's network management includes performance 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 service performance for customers.

**NITCO does not block or throttle access to lawful internet content and does not offer preferential treatment via paid or affiliated prioritization.**

### *NITCO's Network Management Practices*

NITCO 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:

#### **1. Managing Congestion**

NITCO monitors the connections on its network in the aggregate to determine the network's utilization rate. NITCO engineers its network to meet customers' traffic requirements. If there is congestion in the network, NITCO either reroutes internet traffic to alternate facilities or adds network capacity. NITCO may take into consideration real time and non-real time applications in its network management practices to help insure a favorable customer experience. NITCO may also increase capacity by upgrading to ADSL2+ or VDSL, adding transport, adding Internet aggregation routers and adding bandwidth.

On NITCO's network, all customers have online access to all legal services, applications and content. In the event of network 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.

Customers acting in ways that abuse or threaten the NITCO network or violate the Company's Acceptable Use Policy, Internet Service Terms and Conditions, or the Internet Service Agreement will be asked to stop any such actions immediately. A failure to respond to NITCO or to cease any such conduct could result in service suspension or termination.

NITCO's network and congestion management practices are service application-agnostic, based on current network conditions, and are not implemented on the basis of customers' online activities, protocols or applications. NITCO's network management practices do not relate to any particular customer's aggregate monthly data usage. NITCO does not prioritize or discriminate against any applications or protocols except for specialized networks.

#### **2. Network Security**

NITCO understands the importance of securing its network and protecting its customers from network threats and annoyances. The Company promotes the security of its network and customers by providing resources to its customers for identifying and reporting threats such

as spam, viruses, firewall issues, and phishing schemes. NITCO 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.

As a normal practice, NITCO 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, and deny service attacks to protect network integrity and the security of NITCO customers. NITCO filters ports to reduce the spread of computer-related viruses and protect personal computers from intruder access. If NITCO suspects traffic originated by a customer is virus related, NITCO will contact the suspected party. If there is no response from the customer, the customer's service will be suspended until the issue can be resolved.

NITCO does not currently engage in any application-specific behaviors on its network, except as maybe listed in the Specialized Service section of this policy.

### **3. Monitoring Schedule**

NITCO monitors its network for performance. Alarms or alerts are generated if network performance is degraded. In addition, traffic is analyzed and trended to insure peak performance. NITCO adds capacity or reroutes traffic to relieve congestion when identified. NITCO uses industry standard software tools to check for abnormal traffic flows, network security breaches, malware, and other elements that may damage the network. If a breach is detected or high volume users are identified, NITCO provides notification to the customer by either email or telephone. If a violation of NITCO's policies has occurred and such violation is not remedied by the customer, NITCO will suspend or terminate the customer's service.

### **4. Network Management Technology**

NITCO 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

### **5. Service Descriptions**

NITCO offers broadband service over Digital Subscriber Loops (DSL), fixed wireless, WiMax and Ethernet facilities. Due to the differences in technology, not all service tiers and bandwidth options are available to every customer. NITCO offers data several service tiers ranging from 1 M to 50 M. Details of the service offering can be found under the [Wireless](#), [DSL](#), and [Broadband](#), sections of the website.

There are no usage charges for broadband services. The terms and conditions for broadband and internet services are posted on the [NITCO](#) website.

All of NITCO's broadband services are capable of supporting real time applications except for the 1 M wireless offering.

### **6. Network Performance**

NITCO's broadband services are provisioned as "best effort". NITCO makes every effort to support advertised speeds and will perform speed tests as needed to troubleshoot and

resolve speed and application performance issues that exist on the Company's network. However, customers should note that advertised speeds do include some network overhead. NITCO measures availability, latency, and aggregate utilization on the network and strives to meet internal service level targets in its network. However, the customer's connection performance is affected by the particular website being accessed, capacity in the public internet beyond the NITCO network and the customer's computer, inside wiring, wireless router, and other customer-owned equipment.

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

## **7. Specialized Services**

NITCO provides Voice over Internet Protocol (VoIP) services to end users using virtual private network architecture. This service, also known as a Specialized Service, is separated from the company's best effort Internet services on the Local network. Specialized Service traffic is shared and prioritized higher than best effort broadband traffic in the network core. NITCO has not found that this specialized service has any significant impact on the quality of the best efforts services.

## **8. Device Attachment Rules**

NITCO provides modems as part of its broadband services. Customers may attach any industry standard device beyond the modem. If NITCO discovers a customer device is harmful to its network, NITCO has the right to request that the customer remove such device.

9. For questions, complaints or requests for additional information, please contact NITCO at (219) 996-2981 or [Contact Us](#).