Network Management Policy and Internet Transparency Statement
(Revised Jan 2020)

South Plains Telephone Cooperative ("SPTC" or "Company") provides this Policy in order to disclose its network management practices in accordance with the FCC's Open Internet Rules. Information about SPTC's other policies and practices are available at www.sptc.net ("SPTC Website").

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

SPTC manages its network for a number of reasons, including optimization, as well as congestion- and security-protocol-management. Very few of the company's customers are impacted by the protocols and practices that SPTC uses to manage its network.

SPTC's Network Management Practices

SPTC 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. Blocking
As its normal practice, SPTC 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.

II. Throttling
SPTC does not engage in throttling, a practice that degrades or impairs access to lawful internet traffic on the basis of content, application, service, user, or use of a non-harmful device.

III. Affiliated Prioritization
SPTC does not engage in affiliated prioritization, a 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.

IV. Paid Prioritization
SPTC does not engage in paid prioritization, a 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.

V. Managing Congestion
SPTC periodically monitors the connections on its network in the aggregate to determine the rate of utilization. If congestion emerges on the network, the company will engage in the re-routing of Internet traffic to relieve congestion. On our core and access networks, SPTC may increase capacity by adding bandwidth, as needed.

On SPTC's network, all customers have access to all legal services, applications, and content online. In the 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 do occur in SPTC's network.

Customers using conduct that abuses or threatens the company network or which violates the company's Acceptable Use Policy or Internet service Terms and Conditions 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.

SPTC'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. SPTC's network management does not relate to any particular customer's aggregate monthly data usage.

VI. Application-Specific Behavior
Except as may be provided elsewhere herein, SPTC does not currently engage in any application-specific behaviors that block or control the rate of specific protocols or protocol ports, modify protocols in any way not prescribed by the protocol standard, or otherwise inhibit or favor certain applications or classes of applications.

VII. Device Attachment Rules
SPTC does not employ any device attachment rules that place restrictions on the types of devices or require approval procedures for devices to connect to the network.

VIII. Network Security
SPTC 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. The company 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.

IX. Technology
SPTC's network management employs a variety of industry-standard tools, applications, and devices to monitor, secure and maintain its network. Software to measure and monitor traffic usage is employed as well as software for spam filtering and denial of service attacks.

X. Monitoring Schedule
SPTC uses network management software to conduct periodic monitoring of the network in order to detect abnormal traffic flows, congestion, network security breaches, malware, loss, and damage to the network. Monitoring techniques include hourly threshold monitoring.

XI. Network Performance
SPTC takes measurements of various components for network performance, analysis of the measurements to determine normal levels, and determination of appropriate threshold values to ensure required levels of performance for its network. The company measures such components as upload/download speeds, latency, internal testing, and consumer speed tests to gauge network performance. SPTC provides specific network performance measurements on actual vs. advertised upload and download speeds and periodically performs roundtrip latency measurement. The following performance measurements are collected and evaluated on a regular basis:

- Actual Download Speeds
- Actual Upload Speeds
- Latency

The following data was collected 6/8/2018 using a hardwired connection to an 844E GigaCenter off of a 711GE ONT:

30 Mbps down/ 30 Mbps up
Actual Download Speed:	30.7 Mbps
Actual Upload Speed:	31.5 Mbps
Latency / Ping:	6 ms

XII. Impact of Non-BIAS Services
The company does not currently offer any non-BIAS services. Accordingly, customers' broadband experiences will not be impacted.

For questions, complaints or requests for additional information, please contact SPTC by using support@sptc.net email or by calling 806-763-2301.

The privacy policy concerning the inspection of network traffic includes only authorized personnel within the company and law enforcement entities. Redress options regarding end-user and edge-provider complaints are conducted by telephone or premises trips, with infringement a right leading to permanent disconnects.