



**Sand Creek Communication Company
Network Management Practices Policy Disclosure**

Sand Creek Communication Company (SCC) invests significant resources to bring Internet access to our customers and strives to provide customers with an optimum online experience that enables them to access all available and lawful online content and services. The purpose of this document is to disclose information regarding SCC's network management practices, performance, and commercial terms of its fiber optic network service and for content, application service, and device providers to develop, market, and maintain internet offerings, consistent with applicable federal regulations.

These practices, characteristics, terms, and conditions are intended to help preserve the Internet as an open framework that enables consumer choice, freedom of expression, end-user control, competition, and freedom to innovate without permission, while permitting SCC to manage its network in a reasonable fashion. SCC may revise its Network Management Practices Policy from time to time.

Network Management Practices

SCC utilizes reasonable and responsible network management practices that are consistent with industry standards, and that are tailored to achieve legitimate network management purposes. Because SCC has limited bandwidth, it reasonably manages its network to facilitate Internet usage by all its customers. SCC uses reasonable and responsible network management practices in an effort to prevent spam, viruses, security attacks, network congestion and other risks that threaten to degrade service.

Congestion Management

Congestion is an Internet access service problem that can slow web browsing, downloading, and other activities of the customers during certain peak usage periods. Congestion may be caused by capacity limits and bottlenecks in a service provider's own network, or by limitations in the capacity of the Middle Mile transport facilities and services that many rural service providers must purchase from unrelated entities to carry the traffic of their customers between their service areas and the closest Internet nodes.

SCC constantly monitors its network to manage congestion, avoiding over utilization of circuits.

If significant congestion problems arise, SCC's approach is to determine the source of the problem, and to increase the capacity of the affected portions of its network and/or of its Middle Mile routes where warranted. In the event of congestion, all traffic is classified as neutral until congestion passes.

Application-Specific Behavior

SCC does not favor or inhibit applications or classes of applications. Customers may use any lawful and commercially available application. The SCC network does not discriminate against particular types of content. Peer to Peer, streaming video, VoIP, and video downloads are all classified as content neutral.

SCC does not normally monitor the contents of the traffic or applications of its customers. It undertakes no obligation to monitor or investigate the lawfulness of the applications used by its customers. If any party contacts SCC with a substantial allegation that an application being used by a customer is unlawful, SCC will investigate the matter (including consultation, as it deems appropriate, with attorneys, consultants, federal or state regulators, and/or federal, state or local law enforcement agencies), and will take appropriate actions to deal with the use of applications that are demonstrated to be unlawful.

Device Attachment Rules

Only devices that conform to publicly available industry standards, and that are not harmful to SCC's network, are approved for use. SCC reserves the right to disable devices that cause disruptions to SCC's customers or that are not in compliance with industry standards. In the event that SCC disables a device or denies access to application providers, prompt notice will be given of the decision to deny access to the network or disable a device.

Security

SCC provides customers with unrestricted access to all of the lawful content, services, and applications available on the Internet. SCC uses industry standard tools and utilizes best practices and policies to protect customers from spam, phishing, and other unwanted or harmful online content. When SCC identifies harmful or unwanted online content, it may prevent delivery of such content to customers, or customers may be permitted to identify or inspect content to determine if it is harmful or unwanted. SCC security methods are not intended to prevent end-users from running any specific applications.

SCC employs commercially appropriate security procedures to protect its network and its customer records from unauthorized access by third parties. SCC does not guarantee that it can protect customers from any and/or all security breaches.

Performance Characteristics

SCC offers broadband Internet access service via FTTH. SCC makes every effort to support advertised speeds and will dispatch repair technicians to customer sites to perform speed tests as needed to troubleshoot and resolve speeds and performance caused by SCC's network or equipment. SCC is required to do performance testing quarterly and report that to the FCC.

The advertised speed of SCC's Internet service is the maximum speed achievable with the technology utilized by SCC. While the maximum advertised speed is attainable for end users, several factors may affect the

actual speed of SCC's Internet service offerings, including, but not limited to: the end user's computer, router or other personal equipment, activity during peak usage periods, and other Internet traffic.

FTTH, internet services can utilize real-time internet applications, i.e., VoIP, streaming video, video downloads.

Pricing

To meet the usage and budgetary needs of all customers, SCC offers a wide selection of Internet access plan options, including bundled service choices, and a la carte alternatives.

To find out about SCC's pricing on Internet services, visit our website at: <http://www.sandcreekcommunications.com>, or call 517-436-3130 to speak with a customer service representative.

Early Termination Fees

If a customer previously entered into a service agreement with Provider for broadband Internet access service for a defined service term, and customer desires to terminate the service agreement prior to the expiration of that term, Provider may charge a reasonable early termination fee if such fee is clearly indicated in the service agreement.

Usage-Based Fees

SCC Internet service is priced on a flat-fee basis (plus taxes if applicable). SCC does not charge end users a usage-based fee for Internet service.

Privacy Policy

SCC reserves the right to monitor usage rates, bandwidth, transmissions, and content in order to protect the operation of the network through reasonable network management practices discussed above. SCC affords full access to lawful content, services, and applications available on the Internet and does not routinely monitor, inspect, or store the network activity and traffic of its Internet service users.

SCC may collect information regarding customer equipment used on the network, including, but not limited to equipment type, serial number, settings, configuration, and software. SCC may also collect performance information to examine the operation of the equipment, services and applications the customer may use on the network, URLs, data transmission rates and latencies, location information, security characteristics, and information about the amount of bandwidth and other network resources the customer is using in connection with uploading, downloading or streaming data to and from the Internet.

Network traffic, activity, performance information, and equipment information monitored or collected by SCC is done so for the sole purpose of reasonable network management purposes.

SCC Network Management Practices Policy is designed to safeguard our network and its users from spam, viruses, phishing, and other unwanted or harmful on-line content, with the intention of providing the best Internet experience possible for our customers. SCC Network Management Practices are not intended, nor implemented, to block

consumers from accessing the content and applications of their choice, deprive consumers of their entitlement to competition, or discriminate against or in favor of certain network traffic.

SCC is required to comply with relevant state and federal laws, regulations, and judicial orders. Information may be disclosed to third parties if SCC determines, in its sole discretion, that such a disclosure is necessary to protect our interest or the interests of our customer or is required to comply with legal requirements or orders. This information may also be disclosed in connection with the sale of our business.

Contact Us

If you have any questions regarding SCC Network Management Practices Policy or would like to file a complaint regarding its network management practices, please contact us at:

Sand Creek Communication Company
6525 Sand Creek Hwy, Po Box 66
Sand Creek, MI 49279
517-436-3130
<http://www.sandcreekcommunications.com>

If you believe that SCC is in violation of the FCC's Open Internet Rules, you may file either an informal or formal complaint with the FCC.
<http://esupport.fcc.gov/complaints.htm>

Additional Disclaimers

The Open Internet Rules, as adopted, and SCC Network Management Practices Policy are not intended to affect, alter or otherwise supersede the legal status of cooperative efforts by Internet access service providers and other service providers that are designed to curtail infringement in response to information provided by rights holders in a manner that is timely, effective, and accommodates the legitimate interests of providers, rights holders, and end users.

Furthermore, the Open Internet Rules, as adopted, and SCC Network Management Practices Policy do not prohibit SCC from making reasonable efforts to address the transfer of unlawful content or unlawful transfers of content.