General Policy Statement

The Federal Communications Commission ("FCC") requires providers of broadband internet access services, including Waitsfield and Champlain Valley Telecom and its subsidiaries that own and/or operate the broadband network in your area (referred to here as "Green Mountain Access," "we," or "our") to disclose certain information regarding Broadband Service that we offer to our customers (referred to as "you"). These disclosures are in addition to the general terms of services, including the acceptable use policy, that also govern the service and may be found at www.wcvt.com/policies/

The following policies apply to mass market broadband Internet services offered by Green Mountain Access. Customers are encouraged to familiarize themselves with the following policies which are deemed part of their Service Agreement. By using our Internet service, you accept and agree to be bound by these policies. In doing so, you further agree that you are solely responsible for compliance with these terms by third parties, such as friends and family members, who may use your service, with or without permission, to access the broadband network.

Green Mountain Access' policy is to provide reliable access to the Internet for all of our customers in a manner that does not unduly discriminate. As used in this document, "customer" generally refers to residential and small business users (i.e., **mass market**) and may be differentiated from "enterprise" users who tend to be larger business with specialized broadband and IT needs. Enterprise customers may require services that are custom tailored to a specific project and individually priced based on the needs and criteria established by the enterprise customer and if so, those services may be governed by other use policies and agreements specific to that enterprise user.

Transparency Statement

- **Blocking**: Green Mountain Access does not block or discriminate against lawful content. We do however engage in reasonable Congestion Management practices as described below.
- **Throttling**: Green Mountain Access does not throttle, impair or degrade lawful internet traffic.
- **Affiliated Prioritization**: Green Mountain Access does not prioritize internet traffic.
- **Paid Prioritization**: Green Mountain Access does not engage in paid prioritization. We don't prioritize internet access for to benefit particular content, applications, services or devices.
- **Congestion Management**: Green Mountain Access monitors the connections on our network in the aggregate on a daily basis to determine the rate of utilization. If congestion emerges on the network, we will take the appropriate measures to relieve congestion.
- **Application-Specific Behavior**: Except as may be provided elsewhere herein, Green Mountain Access does not currently engage in any application-specific behaviors on our network. Customers may use any lawful applications with Green Mountain Access.
- **Device Attachment Rules**: Customers must use either DHCP or PPPoE for authentication of point-to-point connections between devices on the network. There is a limit of one (1) PPPoE or DHCP session per account. For best results, Broadband modems/gateways, wireless routers, or other proprietary network gateways used on the Green Mountain Access broadband network should be provided by Green Mountain Access. Customers may attach devices of their choosing to their modems, including wired or wireless routers, laptops, desktop computers, video game systems, televisions, or other network-enabled electronics equipment. However, you are responsible for ensuring that any equipment you attach does not harm Green Mountain Access's

network or impair the service of other customers. Green Mountain Access is not responsible for the functionality or compatibility of any equipment provided by our customers. Customers are responsible for securing their own equipment to prevent unauthorized access to Green Mountain Access's broadband network by third parties and will be held responsible for the actions of such third parties who gain unauthorized access through unsecured customer equipment.

- **Network Security**: Green Mountain Access knows the importance of securing our network and customers from network threats and annoyances and we strive to protect our network from such threats as spam, viruses, firewall issues, and phishing schemes. Green Mountain Access also deploys spam filters in order to divert spam from an online customer's email inbox into a quarantine file while allowing the customer to control which emails are identified as spam. Customers may access the spam files through the email. Spam files are automatically deleted if not accessed within 35 days.

Network Services and System Performance

Green Mountain Access provides services via Digital Subscriber Line, Cable Modem, and fiber-to-the-premises technologies. While some broadband services may be less suitable than others for specific applications, our services are generally capable of supporting most internet-based services including but not limited to, Voice over IP (VoIP), gaming, web surfing, and most streaming video applications.

Green Mountain Access manages our network to minimize or avoid blockage and congestion, which may slow down actual speeds experienced by customers particularly at "peak periods" in which network utilization is highest. In the event of network congestion, Green Mountain Access does not prioritize performance within mass market services based on either tier of service purchased or volume of data exchanged.

Green Mountain Access provisions our customers' modems/gateways and engineers our network to ensure that our customers can enjoy the speeds to which they subscribe, however, we do not guarantee that a customer will actually achieve those speeds at all times. Green Mountain Access advertises our speeds as "up to" a specific level based on the tier of service to which a customer subscribes.

The actual speed you experience will vary. During most periods, you can generally expect actual delivered speed ranging from 85% to 100% of the advertised speed purchased.

The actual speed that a customer will experience while using the Internet depends upon a variety of conditions, many of which are beyond the control of Green Mountain Access. These conditions include but are not limited to i) performance of a customer's broadband device, including its age, processing capability, its operating system, the number of applications running simultaneously, and the presence of any adware and viruses; ii) type of connection between a customer's computer and modem. For example, wireless connections may be slower than direct connections into a router or modem. iii) the distance packets travel (round trip time of packets) between a customer's computer and its final destination on the Internet; iv) Congestion or high usage levels at the website or destination; and v) gating of speeds or access by the website or destination deployed by the site owners to manage traffic or performance.

Green Mountain Access provides a tool for testing your broadband connection:

http://speedtest.gmavt.net/

Additionally, there are publicly available speed tests that measure Internet performance. All speed tests have biases and flaws and each test measures limited aspects of an Internet Service Provider's speed and therefore must be seen as a guide rather than definitive measurements of performance.

Network Management

Green Mountain Access utilizes a redundant network architecture that is designed to meet users' demand at peak periods. Green Mountain Access deploys generally accepted technical measures to provide acceptable service levels to all customers, such as application-neutral bandwidth allocation, as well as measures to address service attacks, illegal content and other harmful activities as necessary to protect network integrity and reliability. In doing so, we follow standard best efforts for Internet delivery with respect to allocation of capacity without differentiation among applications, providers, or sources. As described further in our Acceptable Use Policy, we reserve the right to prioritize traffic applications during heavy congestion periods based on generally accepted technical measures that do not unduly discriminate based on site nature or content.

Green Mountain Access utilizes standard industry practices for safeguarding children, intellectual property rights and customers' privacy and security. Green Mountain Access complies with applicable laws and regulations, including the Children's Online Privacy Protection Act, which requires the consent of a parent or guardian for the collection of personally identifiable information from children under 13 as well as the Online Copyright Infringement Liability Limitations Act, a portion of the Digital Millennium Copyright Act that allows Internet service providers to remove or disconnect customer access to copyright infringing material.

A copy of our Privacy notice may be found at: https://www.wcvt.com/policies/

Subject to the terms of our Acceptable Use Policy and service agreements, customers may generally attach the devices of their choice and run the applications of their choice, subject to the limitations of their data plan. Cable modem DOCSIS platforms must be provided by or leased from Green Mountain Access. Green Mountain Access is not responsible for the compatibility, suitability or functionality of any equipment that is provided by the customer or any third party, and the customer remains fully responsible for ensuring that any such equipment does not cause any harm to the network or degrade the service of other users.

Commercial Terms

Available services, terms and conditions, restrictions, limitations and service prices for Green Mountain Access broadband network access services may be found at:

Policies/ Terms and Conditions: https://www.wcvt.com/policies/
Service rates: https://www.wcvt.com/services/internet/high-speed-internet/

Acceptable Use Policy

Important additional terms regarding the use of service can be found in our Acceptable Use Policy located at https://www.wcvt.com/policies/. The AUP outlines the following: (i) prohibited uses and activities; (ii) customer conduct and features of the service; (iii) actions deemed to be a violation of the AUP and penalties for such violations; and (iv) intellectual property, copyright and Digital Millennium Copyright Act ("DMCA") requirements, including designated agent information required for the Internet service providers to qualify for the liability protections afforded Internet service providers by the DMCA.

Questions? Problems? Concerns?

Any questions, problems, or concerns about Green Mountain Access service by customers, potential customers, or application or site providers can be addressed to us:

By email: csdept@wcvt.com
By mail: 3898 Main Street (P.O. Box 9), Waitsfield, VT 05673
Phone: 802-496-3391 / Toll Free: 800-496-3391

Via the Web: www.wcvt.com

When contacting us please provide as much information as possible including dates, times, IP addresses, user names, and specific terms associated with the reported issue. We may require an email or phone number to respond should we not have an immediate response to the reported issue not be feasible.