

# Open Internet Disclosure Statement

## Hamilton Clermont Cooperative (HCC)

The Federal Communications Commission (“FCC”) requires that we provide you with the following information regarding HCC’s broadband Internet access service to schools and libraries through the federal E-rate program, including information regarding any network management practices that HCC employs, the performance characteristics of our services, and the terms of our service offerings. The disclosure is intended to provide current and prospective E-rate customers and providers of “edge” products (i.e., providers of content, applications, service and devices accessed over or connected to HCC’s broadband Internet access service) with sufficient information to make informed choices regarding the use of such services.

The information provided below applies solely to the portion of our network that provides broadband Internet access service, as defined by the FCC. Other portions of our network may be used to provide other services, such as phone service, each of which are subject to their own terms and conditions of service. Nothing herein is intended to address the network management practices, performance characteristics, or commercial terms that may be implemented by the schools and libraries which are the end users we serve, in connection with their provision of Internet service to others.

The information provided herein may be revised from time to time as HCC deems appropriate. HCC’s Acceptable Use Policy and the Terms of Service for HCC’s Internet service available at [www.hccanet.org](http://www.hccanet.org).

### **NETWORK PRACTICES:**

#### **Congestion Management**

HCC manages its network to supply its customers with high quality Internet service. The FCC permits broadband Internet access service providers, such as HCC, to employ “reasonable network management practices” to manage network congestion, where needed. Since schools and libraries purchase our service for primarily educational usage, HCC is particularly attuned to ensuring consistent service at requested speeds for those purposes.

HCC implements filtering and spam detection to manage reliable email sources and mitigate spam that could affect the network. HCC reserves the right to apply “reasonable network management practices” that are commonly used in our industry, as deemed necessary to protect our customers from activities, such as security attacks or extreme traffic spikes, that can negatively affect all or significant portions of the network and may cause service degradation or system overload.

#### **Usage Limits**

HCC does not currently employ usage-based limits on the broadband service provided to its customers.

#### **Application Specific Behavior**

HCC does not discriminate against or prevent users of its broadband Internet access service from accessing lawful content or services; running lawful applications and services of their choice; or connecting their choice of legal devices, so long as such applications, services and/or devices do not harm the network or the provision of

broadband Internet access service, facilitate theft of service, or harm users of the service. Moreover, HCC does not impair or degrade specific content, applications, services or non-harmful devices so as to render them effectively unusable, subject to any reasonable network management practices described herein.

HCC reserves the right to employ reasonable network management practices to prevent specific harmful or illegal activity, such as the dissemination of viruses or other malicious code or the transfer of child pornography or other unlawful content.

### **Device Attachment Rules**

HCC's dedicated Internet access customers are recommended to but not required to obtain their own edge router, switch, or other device that, at a minimum, can host and route the customer's IP addresses for its end users. The customer is responsible for any customer-owned equipment connected to HCC's Internet access service. HCC does not require use of any specific devices.

### **Security**

HCC employs certain practices to ensure the security of our customers and our right to protect our network. These include practices intended to protect HCC servers against Denial of Service attacks and to prevent harmful elements such as viruses, spam and identity theft.

## **PERFORMANCE CHARACTERISTICS**

### **Service Description**

HCC offers their customers Internet access service with speeds and features customized to the needs of the individual school or library. In general, Internet access is available at speeds from 100Mbps to 10,000Gbps, upstream and downstream. For information concerning the particular metrics associated with your service, please reference your Internet access service agreement or call HCC at (513) 728-7937.

The FCC requires that we disclose information regarding the expected and actual speed, latency and packet loss for our Internet access service. HCC utilizes bandwidth monitoring service OOKLA Speed Test and IPERF tools to receive real-time measurements and maximum achievable bandwidth of our service so that we can ensure that customers receive their requested level of service.

As of July 1, 2024, Speed Test reported the following downstream and upstream speeds for our 1GB service to the point of presence in schools being:

Downstream: 998Mbps/sec

Upstream: 997Mbps/sec

The actual speeds achieved by customers within the schools may vary based on a number of factors, including but not limited to: (a) the performance and capabilities of customer's computer; (b) the connection between a customer's computer and modem, such as the use of wireless routers; (c) the distance a packet of information must travel from customer's computer to its final destination on the Internet; (d) congestion or

variable performance at a particular website or destination; or (f) performance characteristics of transmissions over the Internet that are outside of HCC's control.

While there are a number of available tools online that are optimized for residential broadband service, these tools may not provide an accurate measurement of your commercial Internet access service. Please take this into consideration when relying on these measurements and contact HCC directly with any questions regarding your system performance.

The FCC also requires HCC to provide information regarding latency and packet loss. Latency measures the average time it takes for a data packet to travel from one point on a network to another. It is typically measured by round-trip time utilizing milliseconds. While Latency generally does not have a significant impact on day-to-day Internet usage, certain applications may be particularly affected by latency, such as high-definition multiplayer online games. As of July 1, 2024, PRTG measured our latency at >1ms.

Information sent or received from the Internet is transmitted in units known as packets. Packet loss may occur as a result of network congestion. As of July 1, 2024, PRTG measured our packet loss at 0%.

### **Impact of Specialized Services**

The FCC's "Open Internet" rules distinguish between our broadband Internet access and "specialized services" that share capacity with our broadband Internet access services over our last-mile facilities. Examples of these "specialized services" may include HCC's business phone services which utilize voice over Internet protocol ("VoIP") technology. Use of these services, which are not subject to the same rules as our broadband Internet access services, share bandwidth with our Internet access service and because of the nature of the service may sometimes receive priority on our network. As a result, increased use of these services may affect our broadband Internet access service at certain times. HCC monitors the impact of these services on our network to minimize their impact on our broadband Internet access service.

## **COMMERCIAL TERMS**

### **Pricing**

HCC provides its customers with broadband Internet access service pursuant to customer-specific agreements. Pricing is dependent on a number of factors, including location of the service, backbone transport pricing from third party vendors, and duration of the broadband Internet access service agreement. Current customers can locate pricing information on their service agreement or by contacting HCC directly. Prospective customers can obtain pricing information by contacting HCC for information. Current or prospective customers interested in obtaining E-rate funding for services are reminded to take note of the applicable competitive bidding rules to ensure compliance.

### **Redress Options**

If you have any questions or concerns regarding your service, please contact us at (513) 728-7937.

Written complains may be sent via U.S. mail to: HCC, 1007 Cottonwood Dr Loveland, Ohio 45140. The FCC has established procedures for addressing informal and formal complaints relating to its “Open Internet” rules. For information concerning these procedures, please refer to the FCC’s website at <http://www.fcc.gov/guides/getting-broadband>.