

## OPEN INTERNET DISCLOSURE STATEMENT

**FISRT STEP INTERNET, LLC (“Company”) PROVIDES THE FOLLOWING DISCLOSURES WHICH ARE INTENDED TO PROVIDE INFORMATION REGARDING THE NETWORK MANAGEMENT PRACTICES, PERFORMANCE, AND COMMERCIAL TERMS OF COMPANY’S INTERNET ACCESS SERVICES SUFFICIENT FOR CONSUMERS TO MAKE INFORMED CHOICES REGARDING THE USE OF SUCH SERVICES AND FOR CONTENT, APPLICATION, SERVICE, AND DEVICE PROVIDERS TO DEVELOP, MARKET AND MAINTAIN INTERNET OFFERINGS. THESE DISCLOSURES SHOULD BE READ IN CONJUNCTION WITH COMPANY’S “ACCEPTABLE USE POLICY” (“AUP”), AVAILABLE AT [HTTP://WWW.FSR.COM/DOCUMENTS/POLICIES/FSI\\_Network\\_Neutrality\\_Policy](http://www.fsr.com/documents/policies/FSI_Network_Neutrality_Policy)**

*Network Management.* Company seeks to provide subscribers with a consistently high quality online experience. The bandwidth and network resources employed to deliver high-speed Internet service are limited and shared among users and thus it is essential that Company be able to efficiently manage our network in a manner that is designed to deliver the greatest benefit to the greatest number of subscribers. To this end, we can and do employ various network management” tools and techniques that are commonly used in the industry to protect consumers from activity that can unreasonably burden our network and may cause service degradation, including security attacks and network congestion.

These network management tools and techniques may include detecting malicious traffic patterns and preventing the distribution of viruses or other malicious code, limiting the number of peer-to-peer sessions a user can conduct at the same time, limiting the aggregate bandwidth available for certain usage protocols such as peer-to-peer and newsgroups, rate limiting of email, rejection or removal of “spam” or otherwise unsolicited bulk email, port blocking, measuring subscriber bandwidth usage, bandwidth allowances, traffic prioritization and other tools and techniques as Company may from time to time determine are appropriate. New network

management techniques are being developed on an ongoing basis and Company may elect to use some or all available network management techniques on a temporary or as-needed basis.

The network management tools and techniques employed by Company do not and will not target specific usages or applications (such as peer-to-peer) and instead focus in a content-neutral manner on bandwidth usage in real time, with the goal of providing reasonable and equitable access to the network for all similarly situated customers. In other words, to the extent that the use of network management practices may affect the performance or other characteristics of Internet service, they are designed to affect all similarly situated customers equally.

The use of network management tools and techniques to conserve bandwidth may cause certain users to notice slower Internet performance, such as longer download and upload times or slower responses while surfing the Internet or playing games. The effects of network management typically will be noticeable only for a brief period of time, if at all. While it is not possible to predict in advance precisely when Company will determine that conditions warrant the activation of various network management tools and techniques or the impact such techniques may have on performance or other characteristics of Internet service, Company anticipates, based on its experience and that of others in the industry, that use of network management tools and techniques will be rare.

In addition to managing network usage to ensure that the activity of a small number of subscribers at a particular point in time does not degrade, inhibit or interfere with the use of our network by others, Company also maintains an “excessive use” policy that addresses total usage of an account in [a calendar month]. Please see our AUP at <http://www.fsr.com/first-step-internet-policies/> for more information regarding Company’s excessive use policy.

Company does not discriminate against or prevent you or other users of its service from sending and receiving the lawful content of their choice; running lawful applications and using lawful services of their choice; or connecting their choice of legal devices [(except as described below)], provided that such applications and services do not harm the network or the provision of Internet access service, facilitate theft of service, or harm other users of the service. Similarly, Company does not impair or degrade particular content, applications, services or non-harmful devices so as to render them effectively unusable, subject to the reasonable network management practices outlined herein.

As described above, Company reserves the right to employ network management practices, *e.g.*, to prevent the distribution of viruses or other malicious code, as well as to block, in accordance with applicable law, transfer of unlawful content such as child pornography or the unlawful transfer of content. In order to ensure the best experience for customers, certain interactive traffic may be prioritized above non-interactive traffic. Examples of prioritized interactive protocols include VoIP, DNS, VPNs, video game protocols, SSH, RDP, and Telnet. No priority is accorded to particular service providers or end points, only to protocols. In addition, Company may enter into arrangements to provide Internet service to third party establishments (such as educational institutions, coffee shops, bookstores, hotels or libraries) who then may offer such service to their students, customers, guests or others. Nothing herein is intended to address network management practices, performance characteristics or commercial terms that may be adopted by such third party premise operators in connection with the provision of Internet service to others.

The Company requires customers to use a compliant CPE to connect to its network. Use of a non-compliant CPE may be subject to service interruption due to network updates.

Company recommends that customers replace non-compliant equipment with a compliant device.

Company also employs certain practices to protect the security of our customers and our network from unwanted and harmful activities. These include practices designed to protect our servers against Denial of Service attacks and to prevent spam and identity theft. When security measures are employed, they may affect performance characteristics of service or the ability to access certain suspicious websites, but such measures are employed in a manner designed to have non-discriminatory impact on all similarly situated customers.

***Performance Characteristics.*** Company provides what is known as a “fixed broadband” Internet access service that is designed to provide the capability to transmit data to and receive data from all or substantially all Internet end points. Company offers multiple packages of Internet access service for residential or commercial use with varying speeds, features and bandwidth usage limitations that may affect the suitability of such service for real-time applications. The features, pricing and other commercial terms of our service offerings are modified from time to time, and not all packages are available in all areas. Each package is priced to reflect the particular speed, features and bandwidth usage limitations of that package. Full descriptions of currently available packages and pricing can be found on the Company’s website at <http://www.fsr.com/high-speed-wireless-internet-services/>.

Tools for subscribers to measure Internet performance also are available <http://speedtest.fsr.com/>. Note that the results of these tests can and are influenced by a subscriber’s home network configuration and equipment and may have built-in biases and flaws. Consequently, the results of these tests should not be regarded as precise measurements of performance or as guarantees.

Advertised speeds and other performance characteristics are subject to numerous factors including variances in network usage and third party inputs, and thus are provided on a best efforts basis and cannot be guaranteed. Among the factors that may impact the actual speed that a subscriber experiences are (i) the capabilities and capacities of the customer's computer and/or local area network (LAN) devices such as wireless routers; (ii) latency (*i.e.*, the time delay in transmitting or receiving packets as impacted in significant part by the distance between points of transmission); (iii) the performance of the content and application providers the consumer is accessing, such as a search engine or video streaming site; and (iv) performance characteristics of transmissions over portions of the Internet that are not subject to Company's control. Additionally, the Company's services are offered, in part, over unlicensed frequencies that are sometimes also used by unaffiliated, third party providers and users, and while infrequent, those entities use of such frequencies may impact the performance characteristics of Company's at particular times.

Company currently devotes portions of its broadband network to services other than Internet service, and Company may introduce additional such services in the future. Examples of such "specialized services" include voice (phone) and video offerings. [Because all specialized services offered by Company are provided on discrete portions of our network, separate and apart from the bandwidth devoted to Internet service, our specialized service offerings will not impact the capacity available for, or performance of, the broadband Internet service provided to you.]

***Commercial Terms.*** As noted above, Company offers multiple service options, the pricing and other terms and conditions of which can be found at <http://www.fsr.com/high-speed-wireless-internet-service-pricing/>. Nothing herein is intended to supersede or modify any of the

terms and conditions of service as applicable to a particular customer. Additionally, Company also provides ancillary services. A description of these ancillary services and their associated fees can be found at <http://www.fsr.com/moscow-idaho-internet-services/>.

Internet packages are offered as part of a service contract between you and the Company. The duration of these service contracts varies. In the event that a service contract is terminated by the customer prior to its specific end date, the customer may be responsible for payment of an early termination fee. Please contact the Company office at 208.882.8869 or by email at [sales@fsr.com](mailto:sales@fsr.com) to determine if you are responsible for an early termination fee.

Your privacy is very important to us. Personal information you provide to Company is governed by the Company's Privacy Policy, which is posted on Company's Website at <http://www.fsr.com/first-step-internet-policies/> and is subject to change from time to time. Personal information provided by you to the Company is used primarily to provide a customized experience as you use our services, and is generally not shared with third parties. Company reserves the right, as required or permitted by law, to provide account and user information, including email, to third parties and to cooperate with law enforcement authorities in the investigation of any criminal or civil matter. Such cooperation may include, but is not limited to, monitoring of Company's network consistent with applicable law.

Complaints, concerns and questions about the Company's network management practices may be directed to our Customer Service Department, which can be by email at [services@fsr.com](mailto:services@fsr.com) or by phone at 208.882.8869. In addition, the Federal Communications Commission has established processes for addressing formal and informal complaints. For more information, see <http://www.fcc.gov/guides/getting-broadband>.