

OPEN INTERNET POLICY

St. Paul Telephone adopts this Open Internet Policy to promote the Internet as an open platform enabling customer choice, freedom of expression, end-user control, competition, and the freedom to innovate without permission.

GENERAL POLICIES

No Unreasonable Discrimination: St. Paul Telephone does not unreasonably discriminate in transmitting lawful network traffic over a customer's broadband Internet access service, subject to reasonable network management. Reasonable network management practices are set out below. St. Paul Telephone does not

- Discriminate among specific uses, or class of uses, of its network.
- Impair, degrade or delay VoIP applications or services that compete with its voice services or those of its affiliates
- Impair, degrade, delay or otherwise inhibit access by customers to lawful content, applications, services or non-harmful devices.
- Impair free expression by actions such as slowing traffic from particular web sites or blogs
- Demand pay-for-priority or similar arrangements that directly or indirectly favor some traffic over other traffic
- Prioritize its own application, services or devices or those of its affiliates

No Blocking: St. Paul Telephone does not block lawful content, applications, services, or non-harmful devices, subject to reasonable network management. Network management practices are set forth below.

No Unreasonable Discrimination: St. Paul Telephone does not unreasonable discriminate in transmitting lawful network traffic over a customer's broadband Internet access service, subject to reasonable network management. In no case will St. Paul Telephone discriminate among customers on the basis of the type of content, applications, services or devices which the customer uses. Reasonable network management practices are set out below.

NETWORK MANAGEMENT PRACTICES

General: St. Paul Telephone manages its network to provide quality service to its customers. St. Paul Telephone cannot guarantee that it can prevent spam, viruses, security attacks, network congestion and other actions which can affect service. St. Paul Telephone uses various filters, monitoring efforts and other measures to minimize the effects of spam, viruses, security attacks, network congestion and other actions which can affect the service provided to customers. St. Paul Telephone does not guarantee that such filters, monitoring efforts and other measures will be effective.

Congestion Management: St. Paul Telephone has not experienced substantial problems with congestion. However, it may be possible that there are congestion events that may occur in the future, particularly as may be related to the service capacity from third parties used by St. Paul Telephone to provide the customer with access to the world. Such service capacity is outside the control of St. Paul Telephone.

Where feasible, St. Paul Telephone will address congestion issues through improvements to its network or the capacity purchased from other providers needed to connect to the outside world. Such processes take time to implement and may not be feasible in all situations. Therefore, St. Paul Telephone reserves the right to monitor and identify which customer accounts are using the greatest amount of bandwidth during periods of congestion and to work to provide solutions to address those issues. If a preferred solution cannot be worked out with the customer or customers, St. Paul Telephone reserves the right to manage the Internet traffic of high volume customers during periods of significant congestion. This means that the affected customers will still be able to access the Internet and engage in activities that they desire, but during certain periods of time they may experience conditions such as longer times to download or upload files, slower access and slower movements during online game playing. It is expected that any periods of traffic management due to congestion will be brief and infrequent.

APPLICATIONS AND DEVICES

Applications: Customers may use any lawful and commercially available application which they desire. St. Paul Telephone does not normally monitor the contents of the traffic or applications of the customers and undertakes no obligation to monitor or investigate the lawfulness of any specific application used by a customer.

St. Paul Telephone will take steps regarding an application-specific behavior by a customer if there is a reasonable belief that the application will cause harm to St. Paul Telephone's network or is unlawful, including, but not limited to, violating intellectual property rights.

Devices: A customer may use any lawful, compatible type-accepted and commercially available device which they desire on the network provided by St. Paul Telephone, as long as such device does not harm the network and is not unlawful.

SECURITY

Security: While St. Paul Telephone uses various security measures it deems appropriate, St. Paul Telephone undertakes no obligation to monitor or protect customer traffic from spam, viruses, denial of service attacks or other malicious, unlawful or unwarranted activities nor do we guarantee the security measures we provide will be effective. St. Paul Telephone does not guarantee that it can protect customers from any or all security breaches. The customer is using this service at his or her own risk. Customers are cautioned to purchase their own spam filtering, ransomware and antivirus software from commercial vendors to meet their needs. However, a customer that is subject to spam, virus, denial of service attack or similar malicious, unlawful or unwarranted activities is urged to contact St. Paul Telephone as soon as possible. St. Paul Telephone will work with the customer on how the customer can take appropriate and economically reasonable efforts to address the matter.

TERMS AND CONDITIONS FOR USE

Other Matters: Other terms and conditions for use are found at
www.stpaultel.com/legal-documents

PERFORMANCE CHARACTERISTICS

The pricing and service levels for the service provided by St. Paul Telephone can be found at www.stpaultel.com/broadband. The service provided is largely a fiber based type of service consisting of fiber optic digital facilities. Expected access speeds range from 3 Mbps to 100 Mbps download speeds and 1 Mbps to 100 Mbps upload speeds, depending on the capacity of the fiber trunks, the optronics installed and other factors.

Latency is not a significant issue with any of the packages offered by St. Paul Telephone. However, actual access speeds and delay times or latency are impacted by the length, capacity and congestion of transport facilities purchased by St. Paul Telephone from third party providers. St. Paul Telephone cannot guarantee that it will be able to obtain capacity from these third party providers at commercially reasonable prices if and when additional third party capacity is needed to reach Internet nodes.

St. Paul Telephone's ability to deliver the speeds set forth above may be affected by significant use of specialized services such as Internet-based video services. This is a growing area and its effect on St. Paul Telephone's ability to provide service at the speeds listed above are unknown at this time.

Subject to network management considerations, St. Paul Telephone does not impose data caps.

PRIVACY

As a general statement, St. Paul Telephone does not usually engage in inspection of network traffic. St. Paul Telephone does retain and store certain traffic information for time periods

required by federal and state law, including, but not limited to, the identity of the customer using a particular IP address during a specific period of time. St. Paul Telephone does assist law enforcement and provides traffic information that it may have available to it when requested pursuant to the Communications Assistance for Law Enforcement Act, the Foreign Intelligence Surveillance Act and other applicable national and state security and criminal statutes.

ST. PAUL TELEPHONE DOES NOT COLLECT, STORE OR USE TRAFFIC INFORMATION TO PROFILE ITS CUSTOMERS IN ORDER TO SELL ADDITIONAL SERVICES TO THEM OR FOR NON-NETWORK MANAGEMENT PURPOSES.

COMPLAINTS

If a customer has complaints about the service, the customer is urged to contact St. Paul Telephone at 503-633-2111 or go to www.stpaul.com and click on the "Trouble Ticket" and file the concern or complaint electronically. A customer always has the right to file a complaint with the Federal Communications Commission at www.fcc.gov. If you feel you are a victim of identity theft, you should contact the Oregon Department of Justice at www.doj.state.or.us/consumer-protection/contact-us/ and/or the Federal Trade Commission at IdentityTheft.gov.

RESERVATION OF RIGHTS/AMENDMENTS

In the event of any conflict between material found on other links on St. Paul Telephone's web site and this Open Internet Policy, the more specific terms at the other links shall control. St. Paul Telephone may modify this Policy and other policies it has linked for the customer from time to time at its discretion. Notice of such changes will be posted on this web site. However, individual notice to customers, content providers, application providers, service providers or device providers by any means whatsoever shall not be provided unless specifically required to by federal or state law. Notice of changes will be provided in advance normally upon a thirty day basis. However, St. Paul Telephone reserves the right to use a shorter notice period when circumstances so warrant.