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FCC Open Internet Order Transparency Rule

As a provider of broadband services, Wyoming.com is required to comply with the FCC's order no later than November 20, 2011. The Transparency Rule within the Order states:

A person engaged in the provision of broadband Internet access shall publicly disclose accurate information regarding the network management practices, performance, and commercial terms of its broadband Internet access services sufficient for consumers to make informed choices regarding use of such services and for content, application, service, and device providers to develop, market, and maintain Internet offerings.

We believe in consumer choice and maintain policies and procedures that embrace the disclosure of pertinent information to the Wyoming marketplace so that all consumers are empowered to make the best choice for their home or business. Therefore, we gladly accept the FCC's Order and instructions. Our compliance with the Transparency Rule is thus contained within this document.

Network Practices

The Wyoming.com network is defined as all wireline and microwave facilities, and Company-owned and/or maintained equipment, from each end user premise to three Internet Gateways in Wyoming for the purpose of transporting communications traffic. This includes all "last mile" and "middle mile" facilities and routes within this topography. A visual explanation of the Company's network is located for public viewing through its website, <http://www.wyoming.com>.

Congestion Management

All routes and Internet Gateways ("Gateway") within the Wyoming.com network are managed so that congestion is not a concern for any customer. It is our aim to ensure that no route sees congestion. A number of variables can impact network performance and/or the maintenance of any network route or Gateway; some that may be beyond the control of Wyoming.com.



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Our network management policy consists of the following components to ensure a reliable, non-congested network:

1. Consistent monitoring of all network routes and Gateways that includes monthly reporting to the Company's Operations Management. Reporting includes the following for each route and Gateway:
 - a. Total Capacity
 - b. Peak Utilization – actual and percentage of capacity
 - c. Sustained Peak Utilization - actual and percentage of capacity. *Sustained Peak is defined as the peak usage over any sixty minute period*
 - d. Valley Utilization – actual and percentage of capacity
 - e. Average Utilization - actual and percentage of capacity
2. Any route or Gateway that is reported to have Sustained Peak of 75-79% of capacity at least three times within one calendar week is moved to weekly Operations Management review so long as the Sustained Peak is at 75-79% of capacity.
3. Any route or Gateway that is reported to have Sustained Peak of at least 80% of capacity at least three times within one calendar week is automatically moved to the Company's Augmentation process to increase the route or Gateway capacity. Augmentation of any network route or Gateway can take five to one hundred twenty business days depending on the technologies, facilities, and specifications required.

Application-Specific Behavior

Wyoming.com does apply some rules to communications traffic traversing its network depending on the traffic type.

WyoPhone, a Voice-over-Internet Protocol service (provided by Wyoming.com through its commonly-owned affiliate, Contact Communications): QoS (Quality of Service) rules are applied to all WyoPhone traffic to ensure high-quality voice communications provided by the Company. WyoPhone traffic is prioritized throughout the network using the highest priority classification assigned to IP packets.

MPLS-VPN: The Company does allocate dedicated capacity within its network for all customer-purchased MPLS-VPN communications traffic so that the capacity of MPL-VPN purchased is always available to the customer when traffic is present to transport throughout the Company's network or the Internet.



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Other Internet and Data Traffic: The Company does not place any priority or QoS rules to all other Internet and data traffic that traverses its network. We do modify each packet of information at our network entry points to ensure the most efficient movement of traffic throughout our network.

Device Attachment Rules

It is the Company's policy to ensure that all devices attached to its network by the Company's customers involve a NAT-based firewall between the customer's device and the Company's network.

We also do not allow any customer receiving one of the Company's Residential broadband services to maintain any web or web hosting server, or e-mail server attached to the Company's network. This applies regardless of the existence of any firewall or security device at the customer premise.

The Company's complete Terms of Service/Acceptable Use Policy can be found within its website at <http://www.wyoming.com/termsaup.aspx>.

Security Measures

The Company does employ all prudent tactics to minimize negative Internet activity. We block known ports commonly used for virus and spam proliferation as well as other Internet attacks.

Service Performance Characteristics

Service Descriptions

The Company provides a variety of high-speed and Broadband Internet services.

Residential: DSL and Wireless

Business: DSL, Wireless, EtherLink, T1 or DS1, T3 or DS3, Specialty microwave and fiber-based connections

General Descriptions of Services and Service Technologies

Descriptions of each service, including service/speed options, technological parameters and specifications, service areas, and service capabilities can be found through the Company's website at <http://www.wyoming.com>



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Real-Time Applications; Suitability of Services for

All of the Company's high-speed or Broadband Internet services are suitable for real-time applications.

Service Speed and Latency Performance

The Company performs routine testing of network latency and speeds throughout the network. The Company also routinely tests the latency and speeds from end users in each service area to:

1. The Company's Internet Gateways in Rock Springs, Cheyenne, and Riverton;
2. Major Internet location (such as Google, Speakeasy for speed testing, Yahoo)

While the testing of our entire network is a monthly activity, end user-to-network and end user-to-Internet testing is conducted on a semi-annual basis.

The latest *actual* results from our end user testing is detailed in the table below. This table includes end user tests conducted in our service areas for DSL, Wireless, and EtherLink/Hi-Capacity Business Connections. **The figures in the table below show the mean upload and download speed results, and average latency tests within the Company's network and to the Internet.**



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Service Area	DSL Service			Wireless Service			EtherLink/T1/T3/Hi-Capacity		
	Latency to Gateway	Latency to Internet	% of Purchased Speed (down/up)	Latency to Gateway	Latency to Internet	% of Purchased Speed (down/up)	Latency to Gateway	Latency to Internet	% of Purchased Speed (down/up)
Jackson	39ms	88ms	100% / 54%	NA	NA	NA			
Pinedale									
Big Piney	NA	NA	NA	72ms	112ms	72% / 25%	NA	NA	NA
Green River	39ms	88ms	100% / 54%						
Rock Springs	62ms	122ms	80% / 68%	25ms	110ms	96% / 70%			
Rawlins	NA	NA	NA						
Laramie	NA	NA	NA				7ms	44ms	86% / 82%
Cheyenne	14ms	47ms	99% / 85%	NA	NA	NA	6ms	40ms	97% / 88%
Casper				NA	NA	NA			
Riverton									
Lander				10ms	88ms	89% / 84%	5ms	83ms	100% / 100%

NA – Testing not available as the particular service is not offered in that Service area

Latency to Gateway – Measured in milliseconds (ms): End user to Wyoming.com network core router; point immediately prior to Internet peering. End user equipment does effect results thus adding some time to figures in table.

Latency to Internet – Measured in milliseconds (ms): End user to point on the Internet outside of the Wyoming.com network. End user equipment does effect results thus adding some time to figures in table.

% of Purchased Speed: Using actual end user speed testing to known testing sites on the Internet. The percentage represents testing results compared to speed purchased. Download/Upload figures reported.



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Special Notes on Variables That Impact Service Speeds and Performance

The Company's DSL and Wireless services are described as offering "up to" certain speeds. The Company cannot guarantee that end users will *always* experience purchased or advertised speeds. The following variables out of the control of Wyoming.com can affect actual service speed and/or performance experienced by an end user:

1. Performance of an end user's computer, including its age, processing capability, its operating system, the number of applications running simultaneously, and the presence of any adware, malware, or viruses.
2. Type of connection between an end user's computer and DSL modem or Wireless radio. For example, internal/in-home WiFi connections may be slower than direct connections into a DSL modem or Wireless radio. Internal/in-home WiFi connections also may be subject to greater fluctuations, interference and congestion.
3. The distance information packets travel (round trip time of packets) between an end user's computer and its final destination on the Internet, including the number and quality of the networks of various carriers, providers, and/or operators in the transmission path. An end user's connection may traverse the networks of multiple providers before reaching its destination, and the limitations of those networks can affect the overall speed of that Internet connection. The Company cannot be responsible for the speed or quality of any transmission path beyond the Wyoming.com network.
4. Congestion. If a large number of visitors are accessing a site or particular destination on the Internet at the same time, the end user's connection to that site will be affected if the site or destination does not have sufficient capacity to serve all of the visitors efficiently.
5. Gating of speeds or access by the website or destination the end user is accessing or attempting to access. In order to control traffic or performance, many websites limit the speeds at which a visitor can download from their site. Those limitations will carry through to an end user's connection.
6. The performance of the firewall route the end user may have installed. Firewall router performance may degrade over time, and certain devices are not capable of handling higher speeds.



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Commercial Terms

Pricing

DSL and Wireless Broadband: The Company publishes pricing information Residential and Business service packages within its website <http://www.wyoming.com>.

EtherLink, T1 or DS1, T3 or DS3: The Company does not publish pricing for these larger capacity Business offerings within its website because each of these services involves many variables directly relevant to the end user. Other variables including, but not limited to, circuit quantity, bandwidth amount, volume discounts, and term pricing do apply. Therefore, prices for these services is on an individual case basis.

Privacy Policy

The Company cooperates with all government and regulatory agencies in relevance to Customer Proprietary Network Information (WyoPhone service) and the Communications Assistance for Law Enforcement Act (CALEA). Aside for governmental regulations, the Company does not inspect, store, and communications traffic to and from end users. It also does not provide any information of this type to any third party.

Redress Options

The Company provides full-service Customer Service and Network Operations Centers within its headquarters to address any service quality or delivery complaints, issues or problems. The Company provides service expectations and parameters within its customer contracts, and provides avenues of direct communication for the end users to address any and all issues of concern. The Company publishes contact information in its written materials to customers as well as within its website <http://www.wyoming.com>.