# Additional Policies and Disclosures for Internet Services (Transparency Rule)

## **Network Practices**

### Network Management

TransWorld Network, Corp's ("TWN") primary focus is to provide its customers with the best possible online experience. As high-speed bandwidth and network resources are not unlimited, effective network management is essential in providing customers with a high level of service.

We use reasonable network management practices, consistent with industry standards, and also maintain an Acceptable Use Policy located within our Terms and Conditions (https://www.wi-power.com/terms-and-conditions/) for the safety and protection of our network and our Wi-Power® Internet Service customers.

By engaging in reasonable and responsible network management, TWN can help prevent the negative effects of spam, viruses, security attacks, network congestion, and other risks which may at times lead to degradation of service levels.

TWN's network management procedures and tools are dynamic, like the network and its usage, meaning they can and do change frequently. As the Internet and related technologies continue to evolve and advance, TWN's network management tools are intended to evolve and keep pace so that we can endeavor to provide the best possible, most reliable, and safest online experience available to all of our customers. To keep our customers and interested edge providers up to date with our procedures, TWN is committed to providing updates here and in other appropriate locations if we make important or significant changes to our network management techniques.

### Blocking, Throttling, Affiliated Prioritization, Paid Prioritization

TWN does not currently engage in any blocking or throttling practices other than reasonable network management and we do not currently engage in any affiliated or paid prioritization of traffic.

### **Congestion Management**

TWN's network management protocols are designed to ensure, to the greatest extent possible, that all of our high-speed Internet customers have fair and equal access to the Internet and to bandwidth resources by identifying and addressing network congestion issues in a timely and effective manner. TWN applies the same congestion management techniques to business and residential accounts.

Current congestion management protocols are called into play when an area of the network nears a state of congestion to ensure that all customers have a fair share of access to the network. Customer accounts using the greatest amounts of bandwidth and their Internet traffic will be temporarily managed until the period of congestion passes. Customers will still be able to proceed as they were, and many activities will be unaffected, but affected customers can expect to experience longer download or upload times, and activities such as web-surfing and on-line gaming may seem slower or sluggish.

TWN's congestion management method is not conditional on the online activities, protocols or applications a customer uses; it focuses only on the heaviest users in real time, resulting in periods of congestion that typically tend to be fleeting and sporadic. TWN's method is dynamic in nature and based on then current prevailing network conditions as well as customer specific data usage in near real time.

Based on TWN's experience using the current methodology, we have determined that select portions of the network tend to be in a congested state only for relatively small portions of the day, if at all.

TWN constantly monitors how user traffic is affected by our congestion management and overall network management techniques and makes adjustments as necessary to ensure that our Wi-Power Internet customers have a high-quality online experience. TWN also routinely evaluates overall demands on its network for identifying capacity enhancement needs and expansion opportunities.

### Application-Specific Behavior

Wi-Power Digital Phone Service is a separate facilities-based IP phone service that is not affected by TWN's congestion management technique. TWN customers who use VoIP providers that rely on delivering calls over the public Internet who are also using a disproportionate amount of bandwidth during a period when this congestion management technique goes into effect may experience a degradation of their call quality at times of network congestion. It is important to note, however, that VoIP calling, in and of itself, does not use a significant amount of bandwidth. Further, TWN's experience with our current congestion management technique does not indicate significant changes in the quality of VoIP calls, even for managed customer traffic during periods of congestion.

During periods of congestion, any customers who are using a disproportionate amount of bandwidth may be affected by this technique, without regard to the type or content of the online activity. Our technique does not include the determination of applications or protocols are being used or the content, source or destination of the affected online activity.

TWN does not block P2P traffic or like applications as part of its current network congestion management technique. Our network congestion management technique is "protocol-agnostic," meaning that the system does not manage congestion based on the applications being used by customers. It is also content neutral, so it is not dependent on the type of content that is generating traffic congestion. In other words, customer traffic is congestion-managed not based on the applications or content being used, but based on current network conditions and recent amounts of data transferred by users.

TWN provides its customers with full access to all the lawful content, services, and applications available on the Internet. However, we are focused on protecting our customers from spam, phishing, and other unwanted or harmful online content and activities. TWN uses industry standard tools and generally accepted best practices and policies to help us meet this continued goal. In cases where these tools and policies identify certain online content as harmful and unwanted, such as spam or phishing Web sites, TWN seeks to prevent harmful content from reaching customers. In other cases, our tools and policies may permit customers to identify certain content that is not clearly harmful or unwanted, such as bulk email or Web sites with questionable security ratings, and enable those customers to inspect the content further if they want to do so.

### **Device Attachment Rules**

As part of the initial service installation, TWN provides customers with all the necessary and approved equipment to connect to our network. The customer may then connect their computer equipment to TWN's router to access the network.

### Security

TWN employs various practices in our endeavor to help prevent unwanted communications (including spam), and protect our customers' security and that of our network. TWN has limits in place for the number of login, SMTP, DNS, and DHCP transactions per second (at levels far exceeding 'normal' usage) that can be sent to TWN's servers. This is done in order to protect our network against Denial of Service (DoS) attacks. To maintain the effectiveness of these measures, and ensure that these critical services are available for all of our customers, TWN does not disclose these limits. In order to further protect our customers, TWN blocks a limited number of ports that are commonly used to send spam, launch malicious attacks, or steal customer information.

### **Performance Characteristics**

### Service Description

TransWorld Network, Corp. ("TWN") offers its Wi-Power® broadband Internet service and Digital Phone service to both residential and business customers over its Wi-Power fixed wireless broadband network, where available.

TWN has designed the Wi-Power network to operate without reliance on network infrastructure owned by other carriers or telephone companies. TWN deploys and maintains its own fixed wireless network to achieve last-mile connectivity.

### Access Speeds, Latency and Suitability for Real-time Applications

TWN provides residential and commercial customers with a variety of high speed Internet plans from which to choose. We offer "bursting" speed plans and sustained speed plans for our residential and small business customers subject to availability. Individual access to end point Internet connections are available for customers in need of customized solutions. TWN's plans are typically suitable for real-time applications.

Our customer premise equipment and network are engineered to ensure our customers are able to experience the speeds to which they subscribe, however, TWN cannot guarantee that a customer will actually achieve those speeds at all times due to network congestion and other factors. *Bursting Plan Speeds:* We advertise our bursting plan speeds as "up to" a specific level based on the plan to which the customer subscribes. Current bursting plans offered are advertised to provide download/upload speeds up to: 4Mbps/1Mbps (Turbo Plan), 6Mbps/1.5Mbps (Extreme Plan), and 10Mbps/5Mbps (Media 10). Customers can expect to receive actual speeds below the listed "up to" speeds (with bursts of the "up to" speeds as needed/available) and typically experience 15 milliseconds latency on these plans. *Sustained Plan Speeds:* Customers on sustained plans can expect to consistently receive the advertised download/upload speeds for their subscribed plan: 5Mbps/2Mbps (Wi-Power 5), 10Mbps/2Mbps (Wi-Power 10), 15Mbps/2Mbps (Wi-Power 15) and will typically experience 15 milliseconds latency on these plans.

### Commercial Terms

### Pricing and Terms of Service

Service pricing: https://www.wi-power.com/internet-service-plans/ Terms of service, additional fees and descriptions: https://www.wi-power.com/terms-and-conditions/

#### Privacy Policy: https://www.wi-power.com/privacy-policy/

#### Policy/Disclosure Inquiries, Comments and Complaints

Please direct policy/disclosure inquiries, comments, and complaints to TWN as follows:

Toll-free by calling:	1-877-877-6861
Via email at:	customersvc@twncorp.com
In writing at:	TRANSWORLD NETWORK, CORP
-	ATTN: CUSTOMER SERVICE – WI-POWER
	255 Pine Ave N
	Oldsmar, FL 34677

TWN will typically respond within five business days of receipt.