

**MILLINGTON CABLE
XIPLINE BROADBAND INTERNET**

BROADBAND INTERNET SERVICE DISCLOSURES

Updated November 2011

Consistent with FCC regulations,¹ Millington Cable provides this information about our broadband Internet access services. We call these services our “Xipline” Broadband Internet Service. We welcome questions or comments about this information. You may contact us at:

Millington Cable
5115 Easley St.
Millington, TN 38053
901-872-3600
Email: customerservice@xipline.com

NETWORK PRACTICES

General description. We provide a variety of Xipline offerings to our residential and business customers. We provide the service over our broadband network and through third party fiber optic lines connecting to the Internet. We monitor our network and traffic patterns and make changes we deem necessary to manage and improve overall network performance. We use reasonable, nondiscriminatory, network management practices to improve overall network performance to ensure a high-quality online experience for all users. Our network management practices do not target any specific content, application, service, or device. As network management issues arise and as technology develops, we may employ additional or new network management practices. We will update these disclosures as necessary.

Related documents and disclosures. Use of Xipline is also governed by:

- Xipline Broadband Internet Service – Acceptable Use Policy available at <http://www.millingtoncable.com/docs/xipline-aup-032610.pdf>
- Xipline Broadband Internet Service – Product Description and Minimum Equipment Requirements, available at <http://www.millingtoncable.com/docs/xipline-product-definition-and-minimum-equipment-032610.pdf>
- Xipline Broadband Internet Service - Commercial Subscription & Service Agreement, available at <http://www.millingtoncable.com/docs/xipline-commercial-customer-agreement-032610.pdf>
- Xipline Broadband Internet Service - Residential Subscription and Service Agreement, available at <http://www.millingtoncable.com/docs/cc-xipline-customer-agreement-012410.pdf>

¹ 47 CFR 8.3 and *In re: Preserving the Open Internet, Broadband Industry Practices, Report and Order*, 22 FCC Rcd 17905 (2010).

Congestion management. We describe in this section network management practices used to address congestion on our network.

Congestion management practices used.

Network monitoring. We monitor our network for utilization trends. We receive regular reports showing changes in network traffic and congestion. We use this information to plan increases in bandwidth available, port additions, or additional connectivity to the Internet.

Types of traffic affected: Our congestion management practices do not target any specific content, application, service, or device.

Purposes of congestion management practices. Our High Speed Internet network is a shared network. This means that our customers share upstream and downstream bandwidth. The goal of our congestion management practices is to enable better network availability and speeds for all users. Our congestion management practices serve to:

- Help us adapt and upgrade our network to maintain or improve network performance as demand for Xipline increases.
- Help us adapt and upgrade our network to maintain or improve network performance as demand for higher bandwidth applications increases. Some examples of higher bandwidth applications are gaming, streaming movies, and streaming high definition video.

Congestion management criteria.

Network monitoring: Our network monitoring provides data to help us plan upgrades to our network, equipment, technology, and connectivity to the Internet. As demand for Xipline increases, and as demand for higher bandwidth applications increases, we monitor effects on network performance and plan upgrades as we deem necessary. We have not established specific criteria to govern our upgrade decisions.

Effects on end user experience: Because our High Speed Internet network is a shared network, periods of high network demand may result in Internet traffic congestion. End users may experience reduced bandwidth or speed during these times.

Typical frequency of congestion: Congestion tends to occur during periods of peak demand for higher bandwidth applications. Generally, the frequency of congestion tends to increase during 5 p.m. – 1 a.m.

Application-Specific Practices. This section discloses any application-specific practices we use, if any.

Management of specific protocols or protocol ports. To protect the security of our network and our customers, we block known hostile ports.

Modification of protocol fields. None.

Applications or classes of applications inhibited or favored. None.

Device Attachment Rules. This section addresses any limitations on attaching lawful devices to our network.

General restrictions on types of devices to connect to network. We place no restrictions lawful devices that a customer may connect our network, so long as the device is: (i) compatible with our network; and (ii) does not harm our network or other users. Xipline works with most types of PCs and laptops including Macs, and other Internet compatible devices like game systems and Internet enabled TVs. If a wireless router is connected to Xipline, wireless Internet compatible devices including computers, tablets, smartphones and other devices can connect to our network. To Xipline, a customer's computer must meet the minimum requirements set forth in our Xipline Broadband Internet Service – Product Description and Minimum Equipment Requirements, available at <http://www.millingtoncable.com/docs/xipline-product-definition-and-minimum-equipment-032610.pdf>

Cable Modems. Xipline requires connection of a cable modem to our network. You can obtain a cable modem from us or you may purchase one from most retail electronics sellers. Only devices that have been fully certified by CableLabs as compliant with the DOCSIS 2.0 or DOCSIS 3.0 specifications may be used. If you have questions concerning modem compatibility, please contact us.

Network and End User Security. This section provides a general description of the practices we use to maintain security of our network.

Practices used to ensure end user security, including triggering conditions.

Hostile port blocking: We block known hostile ports to prevent unwanted files, browser hacking and virus attacks.

Virus and Spam filtering: For our hosted Xipline email, we filter email and website traffic for virus activity and Spam using industry standard virus scanning and prevention techniques. Should an e-mail message be found to contain a virus or other harmful content, the message will be deleted without notification given to either the sender or the intended recipient(s). We limit virus and spam filtering to our hosted Xipline email. We do not filter email web-based email services like Gmail and Hotmail.

Practices used to ensure security of the network, including triggering conditions.

Hostile port blocking: We block known hostile ports to prevent unwanted files, browser hacking and virus attacks.

Firewall protection: We maintain firewalls to resist hacking and other traffic intended to harm our network.

PERFORMANCE CHARACTERISTICS

General Service Description. Xipline includes wiring, a cable modem and a network interface card (NIC) for the personal computer, if required. Through our Xipline, we serve as a local Internet service provider. Xipline enables residential and commercial subscribers to access all lawful content, applications, and services of their choice available on the Internet.

Service technology. We deliver Xipline over our hybrid fiber-coaxial network using the Data Over Cable Service Interface Specification (DOCSIS). Customers access our network using cable modems. By connecting a wireless router to a cable modem, Customers may also access the network through Wi-Fi compatible devices by connecting a wireless router to a cable modem. To connect from our network to the Internet, we use equipment called a Cable Modem Termination System (CMTS) that acts as a gateway to the Internet for our customers' cable modems. This is a shared network, which means that our customers share upstream and downstream bandwidth.

Expected and actual speeds and latency:

Expected performance. We offer customers a variety of Xipline service levels. We provide a description of the expected maximum transfer speeds associated with each service level in our Product Description and Minimum Equipment Requirements, available at <http://www.millingtoncable.com/docs/xipline-product-definition-and-minimum-equipment-032610.pdf>

Speed. The speeds we identify for each Xipline service level are the maximum upload and download speeds that customers are likely to experience. We provision our customers' modems and engineer our network to deliver the speeds to which our customers subscribe. However, we do not guarantee that a customer will actually achieve those speeds at all times. A variety of factors can affect upload and download speeds, including customer equipment, network equipment, congestion in our network, congestion beyond our network, performance issues with an Internet application, content, or service, and more.

Latency. Latency is another measurement of Internet performance. Latency is the time delay in transmitting or receiving packets on a network. Latency is primarily a function of the distance between two points of transmission, but also can be affected by the quality of the network or networks used in transmission. Latency is typically measured in milliseconds, and generally has no significant impact on typical everyday Internet usage. As latency varies based on any number of factors, most importantly the distance between a customer's computer and the ultimate Internet destination (as well as the number and variety of networks your packets cross), it is not possible to provide customers with a single figure that will define latency as part of a user experience.

Actual speed and latency performance. Actual speed and latency may vary depending upon network conditions and other factors. Actual performance of Xipline in most cases will conform to national wireline broadband Internet speed and latency levels reported by the FCC.² The FCC has reported that customers of coaxial cable-based broadband Internet services receive mean download speeds that are within 93% of advertised speeds during non-peak hours, and 85.7% of advertised speeds during peak hours.³ In addition, the FCC has reported that these same customers experience average latency⁴ delays of 28 milliseconds, increasing by an average of 30 milliseconds during peak hours.

Customer Speed Test. We provide an online speed test for Xipline customers, available at <http://www.millingtoncable.com/xipline.htm>.

Suitability of the Service for Real-time Applications. Xipline is suitable for typical real-time applications including messaging, voice applications, video chat applications, gaming, and Internet video. If users or developers have questions about particular real-time applications, please contact us at: Millington Cable, 5115 Easley St., Millington, TN 38053, 901-872-3600, customerservice@xipline.com

Specialized Services.

Specialized services offered to end users. None.

Effects of specialized services on availability and performance of broadband Internet access service. None.

COMMERCIAL TERMS

Prices. Monthly prices for Xipline are available at <http://www.millingtoncable.com/xipline.htm>

Usage-based fees. None.

Fees for early termination. Customers may purchase Xipline on a month-to-month basis. There are no early termination fees for termination of a month-to-month contract. Customer may also purchase Xipline on a 12-month contract. We offer free installation and other discounts

² See FCC's Office of Engineering and Technology and Consumer Affairs Bureau, *Measuring Broadband, A Report on Consumer Wireline Broadband Performance* in the U.S., OET CGB DOC-308828A1, pp. 4-6 (Aug. 2, 2011) (available at: http://transition.fcc.gov/cgb/measuringbroadbandreport/Measuring_U.S. - Main_Report_Full.pdf).

³ The FCC has defined peak hours measured during "busy hour" as weeknights between 7:00 pm and 11:00 pm local time.

⁴ The FCC has defined latency is the total length of time it takes a signal to travel from an origination point to the nearest server, plus the time for an acknowledgement of receipt to travel back to the origination point. The nearest server is the server providing the minimum round trip time.

with a 12-month contract. If a customer terminates a 12-month contract before the end of the term, we require repayment of installation charges and other discounts.

Fees for additional network services. None.

Privacy Policies. We do not disclose Xipline customer or use information to third parties except: (i) as necessary to provide Xipline service and to manage our network; or (ii) in response to law enforcement requests, court order, or as otherwise required or authorized by law.

Inspection of network traffic.

Virus and Spam filtering For our hosted Xipline email, we filter email and website traffic for virus activity and Spam using industry standard virus scanning and prevention techniques. Should an e-mail message be found to contain a virus or other harmful content, the message will be deleted without notification given to either the sender or the intended recipient(s). We limit virus and spam filtering to our hosted Xipline email. We do not filter email web-based email services like Gmail and Hotmail.

Storage of network traffic information: DHCP (Dynamic Host Configuration Protocol) information is a code included in all network traffic that associates that traffic with a particular cable modem sending or receiving the traffic. We store DHCP information for at least 36 months.

Provision of network traffic information to third parties: We may disclose network traffic information to third parties solely for purposes of providing and maintain our High Speed Data product or if required by law.

Use of network traffic information for non-network management purposes: None.

REDRESS OPTIONS.

Practices for resolving end-user and edge provider complaints and questions:

End users or edge providers with complaints or questions relating to these disclosures should contact:

Millington Cable
5115 Easley St.
Millington, TN 38053
901-872-3600
Email: customerservice@xipline.com

Questions: We will endeavor to answer questions promptly via email or voice.

Complaints: We will provide an initial response in writing within 15 business days of receipt. We will attempt to resolve complaints informally, escalating the matter to senior management if needed.