

## CTS Telecom, Inc. (CTS) Network Management Practices Policy Disclosure

Pursuant to the Federal Communications Commission's newly enacted Open Internet Rules found in Part 8 of Title 47 of the Code of Federal Regulations, CTS Telecom, Inc. (CTS) policies regarding network management practices, performance characteristics, and commercial terms are provided in entirety so that CTS's current customers, prospective customers, third-party content providers and other interested parties can make informed choices regarding the broadband Internet transport services offered by CTS, and the extent CTS's network management practices may affect those services.

### Network Management Practices

CTS employs reasonable network management practices tailored to achieve legitimate network management purposes. By engaging in reasonable and responsible network management, CTS prevents its customers from being subjected to the negative effects of spam, viruses, security attacks and other risks that threaten to degrade service. The network management practices employed by CTS are consistent with industry standards.

During routine meetings, CTS engineers review all proposed changes to the network infrastructure to ensure that network availability will not be compromised and to confirm that networking standards and best practices are followed. Emergency network change requests and network maintenance proposals undergo a strict network design review to ensure the integrity of the network and to preserve the neutral network environment.

### Congestion Management

CTS does not employ any congestion management tools and/or software on network traffic. CTS maintains sufficient bandwidth to service its directly peered customers.

CTS employs a standard best effort Internet delivery policy to ensure that any organization, institution or entity connected, directly or indirectly, to CTS's backbone network may exercise choice in lawful Internet content, web-based application and use of CTS or competitor service, including any device which is not harmful to the network.

For organizations utilizing CTS hosted mail service, CTS may employ filtering for SPAM and viruses on email sent to the subscribing organizations.

### Network Openness and Fair Use

CTS actively engages and encourages open settlement-free peering with providers and operators. CTS's network management policies prohibit the discrimination of legitimate or legal use of network capacity bandwidth by application, source or use of the network. CTS Network does not limit or impose any limitations on users at subscribing organizations to lawfully possess, use, or distribute Internet content.

All of the preceding is subject to the needs of law enforcement. CTS does not favor any lawful Internet applications or content over others, and is committed to enabling competition among network providers, application and service providers, and content providers.

