

**Open Internet Disclosure Statement of**  
**The SouthWest Ohio Computer Association**  
**(SWOCA)**

The Federal Communications Commission (“FCC”) requires that we provide you with the following information regarding SWOCA’s broadband Internet access service to schools and libraries through the federal E-rate program, including information regarding any network management practices that SWOCA employs, the performance characteristics of our services, and the terms of our service offerings. The disclosure is intended to provide current and prospective E-rate customers and providers of “edge” products (i.e., providers of content, applications, service and devices accessed over or connected to SWOCA’s broadband Internet access service) with sufficient information to make informed choices regarding the use of such services.

The information provided below applies solely to the portion of our network that provides broadband Internet access service, as defined by the FCC. Other portions of our network may be used to provide other services, such as phone service, each of which are subject to their own terms and conditions of service. Nothing herein is intended to address the network management practices, performance characteristics, or commercial terms that may be implemented by the schools and libraries which are the end users we serve, in connection with their provision of Internet service to others.

The information provided herein may be revised from time to time as SWOCA deems appropriate and should be read in conjunction with SWOCA’s Privacy Policy available at [www.swoca.net](http://www.swoca.net), SWOCA’s Acceptable Use Policy and the Terms of Service for SWOCA’s Internet service available at [www.swoca.net](http://www.swoca.net),

## **NETWORK PRACTICES:**

### **Congestion Management**

SWOCA manages its network to supply its customers with high quality Internet service. The FCC permits broadband Internet access service providers, such as SWOCA, to employ “reasonable network management practices” to manage network congestion, where needed. Since schools and libraries purchase our service for primarily educational usage, SWOCA is particularly attuned to ensuring consistent service at requested speeds for those purposes.

SWOCA implements filtering and spam detection to manage reliable email sources and mitigate spam that could affect the network. SWOCA reserves the right to apply “reasonable network management practices” that are commonly used in our industry, as deemed necessary to protect our customers from activities, such as security attacks or extreme traffic spikes, that can negatively affect all or significant portions of the network and may cause service degradation or system overload. Use of these practices is announced to customers when conditions warrant their implementation.

### **Usage Limits**

SWOCA does not currently employ usage-based limits on the broadband service provided to its customers.

### **Application Specific Behavior**

SWOCA does not discriminate against or prevent users of its broadband Internet access service from accessing lawful content or services; running lawful applications and services of their choice; or connecting their choice of legal devices, so long as such applications, services and/or devices do not harm the network or the provision of broadband Internet access service, facilitate theft of service, or harm users of the service. Moreover, SWOCA does not impair or degrade specific content, applications, services or non-harmful devices so as to render them effectively unusable, subject to any reasonable network management practices described herein.

SWOCA reserves the right to employ reasonable network management practices to prevent specific harmful or illegal activity, such as the dissemination of viruses or other malicious code or the transfer of child pornography or other unlawful content.

### **Device Attachment Rules**

SWOCA's dedicated Internet access customers are required to obtain their own router, switch, or other device that, at a minimum, can host and route the customer's IP addresses for its end users. SWOCA's customers are responsible for utilizing router(s), switch(es), or other devices that are EIGRP routing protocol, and SWOCA's network staff must be granted management level access to such a device.

### **Security**

SWOCA employs certain practices to ensure the security of our customers and our right to protect our network. These include practices intended to protect SWOCA servers against Denial of Service attacks and to prevent harmful elements such as viruses, spam and identity theft. To that end, SWOCA blocks a limited number of ports and hosts commonly identified to send malicious traffic, perpetrate identity theft, or launch network attacks.

## **PERFORMANCE CHARACTERISTICS**

### **Service Description**

SWOCA offers their customers Internet access service with speeds and features customized to the needs of the individual school or library. In general, Internet access is available at speeds from 10 Megabits to 1 Gigabit, upstream and downstream. For information concerning the particular metrics associated with your service, please reference your Internet access service agreement or call SWOCA at 513-867-1028.

The FCC requires that we disclose information regarding the expected and actual speed, latency and packet loss for our Internet access service. SWOCA utilizes industry

standard bandwidth monitoring tools to receive real-time and historic measurements of our service so that we may ensure that customers receive their requested level of service.

As of September 8<sup>th</sup> 2015, SWOCA recorded the following downstream and upstream speeds for our 1GB service to the point of presence in a sample of districts and buildings served:

Downstream: 937.48 Mbps

Upstream: 928.36 Mbps

The actual speeds achieved by customers within the schools may vary based on a number of factors, including but not limited to: (a) the performance and capabilities of customer's computer; (b) the connection between a customer's computer and modem, such as the use of wireless routers; (c) the distance a packet of information must travel from customer's computer to its final destination on the Internet; (d) congestion or variable performance at a particular website or destination; or (e) performance characteristics of transmissions over the Internet that are outside of SWOCA's control.

While there are a number of available tools online that are optimized for residential broadband service, these tools may not provide an accurate measurement of your commercial Internet access service. Please take this into consideration when relying on these measurements and contact SWOCA directly with any questions regarding your broadband Internet service.

The FCC also requires SWOCA to provide information regarding latency and packet loss. Latency measures the average time it takes for a data packet to travel from one point on a network to another. It is typically measured by round-trip time utilizing milliseconds. While latency generally does not have a significant impact on day-to-day Internet usage, certain applications may be particularly affected by latency, such as high-definition multiplayer online games. As of September 8<sup>th</sup> 2015, SWOCA measured our average latency at 4 ms.

Information sent or received from the Internet is transmitted in units known as packets. Packet loss may occur as a result of network congestion. As of September 8<sup>th</sup>, 2015, SWOCA measured our packet loss at less than .001%.

### **Impact of Specialized Services**

The FCC's "Open Internet" rules distinguish between our broadband Internet access and "specialized services" that share capacity with our broadband Internet access services over our last-mile facilities. Examples of these "specialized services" may include SWOCA's business phone services that utilize voice over Internet protocol ("VoIP") technology. Use of these services, which are not subject to the same rules as our broadband Internet access services, share bandwidth with our Internet access service and because of the nature of the service may sometimes receive priority on our network. As a result, increased use of these services may affect our broadband Internet access service at

certain times. SWOCA monitors the impact of these services on our network to minimize their impact on the customer's broadband Internet access service.

## **COMMERCIAL TERMS**

### **Pricing**

SWOCA provides its customers with broadband Internet access service pursuant to customer specific agreements. Pricing is dependent on a number of factors, including location of the service, backbone transport pricing from third party vendors, and duration of the broadband Internet access service agreement. Current customers can locate pricing information on their service agreement or by contacting SWOCA directly. Prospective customers can obtain pricing information by contacting SWOCA for information. Current or prospective customers interested in obtaining E-rate funding for services are reminded to take note of the applicable competitive bidding rules to ensure compliance.

### **Privacy Policy**

SWOCA values the privacy of our customers. The personal information that you provide to SWOCA is governed by our Privacy Policy available at [www.swoca.net](http://www.swoca.net) which is subject to change from time to time.

### **Redress Options**

If you have any questions or concerns regarding your service, please contact us at 513-867-1028. Customers may also email us at [adm@swoca.net](mailto:adm@swoca.net).

Written complaints may be sent via U.S. mail to:

SouthWest Ohio Computer Association  
3611 Hamilton-Middletown Rd.  
Hamilton, Ohio 45011

The FCC has established procedures for addressing informal and formal complaints relating to its "Open Internet" rules. For information concerning these procedures, please refer to the FCC's website at <http://www.fcc.gov/guides/getting-broadband>.