

CONWAY CORPORATION
BROADBAND INTERNET SERVICE DISCLOSURES

Update November 20, 2011

Consistent with FCC regulations,^[1] Conway Corporation provides this information about our broadband Internet access services. Questions or comments about this information are welcome. Please call 501-450-6000 or email comments@conwaycorp.net.

Network Practices

General Description. Conway Corporation provides a variety of Internet service offerings to residential and business customers. Those services are provided over our broadband network and through third party fiber optic lines connecting to the Internet. Network and traffic patterns are monitored and changes made when deemed necessary to manage and improve overall network performance. Conway Corporation uses reasonable, nondiscriminatory, network management practices to improve overall network performance to ensure a high-quality online experience for all users. Network management practices do not target any specific content, application, service, or device. As network management issues arise and as technology develops, Conway Corporation may employ additional or new network management practices. These disclosures will be updated as necessary.

Related Documents and Disclosures. Use of Conway Corporation Internet service is also governed by:

- Conway Corporation Services & Rates Information, available [here](#).
- Conway Acceptable Use Policy, available [here](#).
- Conway Privacy Policy, available [here](#).

Congestion Management. This section describes network management practices used by Conway Corporation to address congestion on our network.

Congestion management practices used.

Real-time “fair share” traffic management. Conway Corporation utilizes real-time monitoring and application/protocol agnostic means of maximizing performance for as many customers as possible by ensuring that each user has access to a fair share of the available bandwidth. When network congestion thresholds are reached, traffic management practices are applied universally or in stages based on severity.

Types of traffic affected. All network traffic is potentially affected by this practice as congestion can occur anywhere at any time on Conway Corporation’s network.

Purposes of congestion management practices. Conway Corporation’s congestion management practices serve to moderate demands on the network during periods of peak network traffic. Our Internet network is a shared network. This means that customers share upstream and downstream bandwidth. The goal of our congestion management practices is to enable better network availability and broadband speeds for all users.

Congestion management criteria. Conway Corporation’s network management is performed in real time. Traffic intervention is triggered by network congestion, and ceases whenever the triggering network congestion is cleared. When the network consumption reaches a high threshold, of 90% of maximum

bandwidth, customers' quality of service configuration file is dynamically changed, allowing a more even and ubiquitous distribution of bandwidth among all customers on the network. Once consumption on the network drops below the threshold, all active management of flows on the network ceases.

Effects on end user experience. Conway Corporation's congestion management technique does not manage congestion based on the online activities, protocols or applications a customer uses; it only focuses on the overall peaks in real time. Our congestion management technique has no impact on real-time protocols such as those used to provide voice or video.

Typical frequency of congestion. Network congestion occurs on some portion of the network on a daily basis. Congestion tends to occur during periods of peak demand such as prime time hours. The congestion management technique focuses on the peak usage in real time, so the periods of congestion typically tend to be limited and short-lived in any 24-hour period.

Application-Specific Practices. This section discloses any application-specific practices Conway Corporation uses, if any.

Management of specific protocols or protocol ports. All ports and protocols are subject to Conway Corporation's management practices. However, the traffic is broadly categorized into real time and non-real time, based upon the impact the traffic intervention would have on the customer's online experience. As described below, to ensure network and end user security, practices may be employed that affect specific protocols or ports.

Modification of protocol fields. Conway Corporation does not manipulate, change, modify, or alter any protocols in any respect.

Applications or classes of applications inhibited or favored. Conway Corporation management practices favor real-time protocols, such as voice and video universally.

Device Attachment Rules. This section addresses any limitations on attaching lawful devices to Conway Corporation's network.

General restrictions on types of devices to connect to network. Conway Corporation's Internet service requires connection of a cable modem to our network. Customers can lease a cable modem from Conway Corporation or 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. In addition, a customer's computer must meet the minimum requirements set forth by Conway Corporation's service and rates, available [here](#). Beyond these minimum requirements, Conway Corporation's service works with most types of PCs and laptops including Macs. If a customer or potential customer believes they have an unusual configuration, our customer service department will help determine if there is a compatibility problem.

Network and End User Security. This section provides a general description of the practices Conway Corporation uses to maintain security of our network and end users, including triggering conditions.

Practices used to ensure security of the network, including triggering conditions. Conway Corporation uses a variety of industry standard practices to protect its network from harmful attacks.

Traffic monitoring: Viruses, worms, Trojans, and other “malware” or “spyware” pose a significant threat to our network and users. In an effort to minimize these threats, Conway Corporation constantly monitors the activity and traffic patterns of its network. If it is reasonably determined that traffic from a user customer is some form of harmful traffic, the flow of some or all of the traffic will be suppressed from the user until it is determined that the traffic has ceased or that the traffic is legitimate traffic.

Performance Characteristics

General Service Description. Conway Corporation’s cable modem Internet service product includes wiring, a cable modem and a network interface card (NIC) for the personal computer, if required. Through Conway Corporation’s Internet service products, it serves as a local Internet service provider. Those Internet service products enable residential and commercial subscribers to access all lawful content, applications, and services of their choice available on the Internet.

Cable Modem Internet Service Technology. Cable modem Internet service is delivered over Conway Corporation’s hybrid fiber-coaxial network using the Data Over Cable Service Interface Specification (DOCSIS). Customers access the network using cable modems. To connect from the network to the Internet, equipment called a Cable Modem Termination System (CMTS) is used. The CMTS acts as a gateway to the Internet for 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. Residential customers are offered a variety of high speed Internet plans to choose from, ranging from our Basic service (with speeds up to 4 Mbps downstream and 512 Kbps upstream) to Turbo service (with speeds up to 50 Mbps downstream and 3 Mbps upstream). A complete description of the transfer speeds provided with each specific product offering for residential and business customers is available [here](#).

Speed. The speeds identified for each Internet access service level are the maximum upload and download speeds that customers are likely to experience. Customers’ modems are provisioned and the network is engineered to deliver the speeds to which customers subscribe. However, Conway Corporation cannot 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 the network, congestion beyond the 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 performance for Conway Corporation’s cable modem Internet service follows.

Cable modem service. Actual speed and latency experienced may vary depending upon network conditions and other factors. Actual performance of Conway Corporation's Internet access service 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 latency^[4] delays of 28 milliseconds, increasing by an average of 30 milliseconds during peak hours.

Customer speed test. We provide an online speed test for our Internet service customers, available [here](#).

Suitability of the service for real-time applications. Our Internet service 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 by phone at (501) 450-6000 or by email at comments@conwaycorp.net.

Specialized Services.

Specialized services offered to end users. Conway Corporation does not offer any specialized services to end users.

Effects of specialized services on availability and performance of broadband Internet access service. Not applicable.

Commercial Terms

Prices. Monthly prices for our broadband Internet services are available [here](#).

Usage-based fees. Not applicable.

Fees for early termination. Not applicable.

Fees for additional network services. Not applicable.

Privacy Policies. Conway Corporation reserves the right to disclose network traffic information to third parties solely for purposes of providing and maintaining its Internet service product or if required by law. For further information on privacy policies, see Conway Corporation's Privacy Policy, available [here](#).

Inspection of Network Traffic. Conway Corporation routinely monitors network and traffic patterns.

Traffic monitoring. Viruses, worms, Trojans, and other "malware" or "spyware" pose a significant threat to Conway Corporation's network and users. In an effort to minimize these threats, Conway Corporation constantly monitors the activity and traffic patterns of its network.

Storage of network traffic information for cable modem Internet service. 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. Conway Corporation stores DHCP information for at least six months.

Provision of network traffic information to third parties. Conway Corporation may disclose network traffic information to third parties solely for purposes of providing and maintaining its Internet service 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 should contact us by phone at (501) 450-6000 or by email at comments@conwaycorp.net.

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

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

[1] 47 C.F.R. § 8.3 and *In re: Preserving the Open Internet, Broadband Industry Practices*, Report and Order, 22 FCC Rcd 17905 (2010).

[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.