

**The following Jefferson Telephone Company (DBA, Jefferson Telecom) disclosures are in reference to the FCC Open Internet Rules and the Restoring Internet Freedom Order.**

**Service Offerings**

Jefferson Telephone Company via the Jefferson Telecom brand directly offers broadband ISP services through NetINS (DBA, Aureon) in its markets. Please visit the Jefferson Telecom website to check availability, speed options and pricing at <https://www.jeffersontelecom.com/>.

**Performance**

Aureon is the Internet upstream provider for Jefferson Telecom. Aureon offers a speed test site to any user or customer. It can be accessed here: <https://www.netins.net/speedtest>. These tests are heavily dependent on a customer's home network configuration, modem, and computers, and therefore do not reflect the performance of the Jefferson Telecom network only.

**Your Internet Service Speeds**

Jefferson Telecom provides residential and commercial customers with a variety of high-speed Internet plans from which to choose, ranging from our initial tier (with download speeds up to 50 megabits per second ("Mbps"), and upload speeds up to 50 Mbps to our top tier (with download speeds up to 940 Mbps, and upload speeds to 940 Mbps). Jefferson Telecom provisions its customers' modems and engineers its network to ensure that its customers can enjoy the speeds to which they subscribe. However, Jefferson Telecom does not guarantee that a customer will actually achieve those speeds at all times. Without purchasing an expensive, dedicated Internet connection, no Internet Service Provider ("ISP") can guarantee a particular speed at all times to a customer. Jefferson Telecom advertises its speeds as "up to" a specific level based on the tier of service to which a customer subscribes.

The "actual" speed that a customer will experience while using the Internet depends upon a variety of conditions, many of which are beyond the control of an ISP such as Jefferson Telecom.

These conditions include:

1. Performance of a customer's computer, including its age, processing capability, its operating system, the number of applications running simultaneously, and the presence of any adware and viruses.
2. Type of connection between a customer's computer and modem. For example, wireless connections may be slower than direct connections into a router or modem. Wireless connections also may be subject to greater fluctuations, interference and congestion. Jefferson Telecom does not recommend wireless modem connections for use with its higher speed tiers as many wireless connections do not perform at the speeds delivered by these tiers.
3. The distance packets travel (round trip time of packets) between a customer's computer and its final destination on the Internet, including the number and quality of the networks of various operators in the transmission path. The Internet is a "network of networks." A customer's connection may traverse the networks of multiple providers before reaching its destination, and the limitations of those networks will most likely affect the overall speed of that Internet connection.

4. Congestion or high usage levels at the website or destination. If a large number of visitors are accessing a site or particular destination at the same time, your connection will be affected if the site or destination does not have sufficient capacity to serve all of the visitors efficiently.
5. Gating of speeds or access by the website or destination. In order to control traffic or performance, many websites limit the speeds at which a visitor can download from their site. Those limitations will carry through to a customer's connection.
6. The performance of the modem you have installed. Modem performance may degrade over time, and certain modems are not capable of handling higher speeds.

This is the reason that Jefferson Telecom, like all other ISPs, advertises speeds as "up to" a particular level, and does not guarantee them.

There are other speed tests that measure Internet performance. We have provided links to a few of these sites below for your reference. Please note, however, that all speed tests have biases and flaws.

Each of these test's measures limited aspects of an ISP's speed and therefore must be seen as a guide rather than definitive measurements of performance.

- <https://www.netins.net/speedtest>
- <https://www.speedtest.net/>
- To test mobile broadband performance on iPhone and Android devices, use the FCC's Mobile Broadband Speed Test App. Learn more: <https://www.fcc.gov/general/measuring-mobile-broadband-performance>

## **Transparency**

Jefferson Telecom shall make available public information on its website [www.jeffersontelecom.com](http://www.jeffersontelecom.com) regarding its network management practices, performance and commercial terms of its service sufficient for consumers to make an informed choice regarding their use of such services.

Jefferson Telecom does not block, throttle, discriminate in any way, or create any type of fast or slow lanes through prioritization paid or not.

## **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.

## **Congestion Management**

Jefferson Telecom does not implement any congestion management techniques. Jefferson Telecom operates our network to accommodate the necessary traffic requirements. In the event of congestion, all traffic is classified as best effort.

Our congestion management approach will change over time, as we continue to study and enhance our practices and as new technologies emerge. In the meantime, we will continue to invest in our network in accordance with our normal course of business operations, which includes installing technology that will increase the speed and capacity of our services.

## **Content, Applications, Service and Device Providers**

As a full-service Internet Service Provider, Jefferson Telecom delivers a variety of Internet based applications. These include:

- Voice over Internet Protocol (VoIP)
- Email

Jefferson Telecom does not discriminate any customer traffic. Jefferson Telecom utilizes the network management techniques that are equal and standard across all user applications. We do not modify our network to make our directly served applications perform better than applications a user would access over the general Internet. For example, Jefferson Telecom does not manipulate our network to perform better for customers accessing Jefferson Telecom email servers versus Jefferson Telecom customers accessing Google's Gmail.

The network management practices employed by Jefferson Telecom do not differ between our directly offered applications to those general applications offered over the Internet.

## **Security Measures**

In the event of Denial of Service (DoS), Distributed Denial of Service (DDoS) attack, spoofing or other malicious traffic, Jefferson Telecom will implement inbound and outbound filtering on specific hosts. These actions will be performed to ensure reliability and availability of the Jefferson Telecom Network. These actions will not be utilized for normal Internet applications and traffic.

NOTE: Aureon may perform this action on behalf of Jefferson Telecom equipment that is managed by Aureon.

## **Privacy Policy**

Jefferson Telecom has provided this privacy statement in order to demonstrate our firm commitment to your privacy. The following policy discloses our information gathering and dissemination practices for Jefferson Telecom.

## **Information**

Jefferson Telecom is the sole owner of the information collected on its website.

## **Viewer Privacy**

Jefferson Telecom does not collect personal information such as names, e-mail addresses, postal addresses, or telephone numbers. Since we do not collect any personal information on this Web site, we do not share any personal information with any third parties nor do we use any personal information for any purposes.

## **IP Addresses**

As noted above, we do not collect any personal information on this Web site. We do, however, collect and store information about your Internet connection when you visit our Web site to read or download information, such as reports, news, etc. We use this information to track Web site use, measure site traffic, and improve site navigation and information. We collect information that identifies:

- The name of the domain you access the Internet with.
- The type of web browsing software you use to view our site.
- The date and time of your access.
- The platform you are using (i.e. Windows, Macintosh or Unix).

This information is never sold, given or disclosed to third parties. This information is used internally to administer our web site, provide better services to the public, and provide aggregate traffic statistics to Jefferson Telecom staff. No personal information is collected.

## **Hyperlinks**

Additionally, this site contains links to other sites. Jefferson Telecom is not responsible for the privacy practices or the content of such Web sites unless operated directly by Jefferson Telecom. We encourage you to note when you leave our website and read the privacy statements of each website that collects personally identifiable information.

## **Pricing**

Please click on the following website link for Internet pricing information:  
<http://www.jeffersontelecom.com/residential>.

## **Acceptance and Jurisdiction**

By using this service, you agree that you have read, understand and will abide, and be bound, by the terms of this Web Site Privacy and Policies ("Terms"). If you do not agree to these Terms, please do not use the Jefferson Telecom web site. These Terms shall be governed in all respects in accordance with the laws of the State of Iowa without regard to the conflict or choice of law rules thereof. Courts sitting in the State of Iowa, federal and state, shall have exclusive jurisdiction over any dispute arising hereunder.

Jefferson Telecom reserves the right to change, modify or update this statement at any time without notice.

## **Contacting Jefferson Telecom**

If you have any questions about this privacy statement, the practices of this site, or your dealings with Jefferson Telecom, you may contact us at the following:

**Jefferson Telecom**  
**105 W. Harrison Street**  
**P.O. Box 269**  
**Jefferson, Iowa 50129**  
**Phone: 515-386-4141 Fax: 515-386-2600**

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