

# Canby Telephone Association dba DirectLink

## Open Internet Policy

**Purpose:** DirectLink is committed to facilitating the operation of an open Internet through the promulgation of its open Internet policy for DirectLink Internet, its Internet service. DirectLink seeks to foster transparency in how it operates as an ISP by explaining how DirectLink handles Internet traffic congestion such as the issues of when and if blocking occurs, whether rate controls are applied and whether certain applications or class of applications are favored.

**Effective Date:** This policy is effective immediately.

**Blocking/Non-Discrimination:** DirectLink does not unreasonably discriminate in transmitting lawful network traffic over a customer's broadband Internet access service, subject to reasonable network management.

### **DirectLink does not:**

- Discriminate among specific uses, or class of uses, of its network
- Impair, degrade or delay VoIP applications or services that compete with its voice services or those of its affiliates
- Impair, degrade, delay or otherwise inhibit access by customers to lawful content, applications, services or non-harmful devices
- Impair free expression by actions such as slowing traffic from particular websites or blogs
- Demand pay-for-priority or similar arrangements that directly or indirectly favor some traffic over other traffic
- Prioritize its own application, services or devices or those of its affiliates

**No Blocking:** DirectLink does not block lawful content, applications, services, or non-harmful devices, subject to reasonable network management.

**Network Management Practices:** DirectLink does not utilize measures to control usage or to control congestion and does not block legal Internet traffic (but does block that traffic that constitutes child pornography, material that constitutes copyright infringement or the transmission of spam e-mail). DirectLink does block specific ports at times to protect the security and integrity of the network and at the same time blocks unwanted traffic such as spam viruses and denial of service attacks by filtering all Net BIOS ports coming in from the Internet and going out to the internet, as well as preventing computers infected with viruses from sending out unsolicited Internet traffic by filtering that specific port. In addition, DirectLink will block unlawful content if notified by appropriate authority.

Where feasible, DirectLink will address congestion issues through improvements to its network or the capacity purchased from other providers needed to connect to the outside world. Such processes take time to implement and may not be feasible in all situations. Therefore, DirectLink reserves the right to monitor and identify which customer accounts are using the greatest amount of bandwidth during periods of heavy congestion and to work to provide solutions to address those issues. If a preferred solution cannot be worked out with the customer or customers, DirectLink reserves the right to manage the Internet traffic of high volume customers during periods of significant congestion. This means that the affected customers will still be able to access the Internet and engage in activities that they desire, but during certain periods of time they may experience conditions such as longer times to download or upload files, slower access and slower movements during online game playing. It is expected that any periods of traffic management due to congestion will be brief and infrequent.

**Use of Network:** In no case will DirectLink discriminate among customers on the basis of the type of content, applications, services or devices which the customer uses.

**Applications:** Customers may use any lawful and commercially available application which they desire. DirectLink does not normally monitor the contents of the traffic or applications of the customers and undertakes no obligation to monitor or investigate the lawfulness of any application-specific behavior by a customer if there is a reasonable belief that the applications will cause harm to DirectLink's network or is unlawful, including, but not limited to, violating intellectual property rights.

**Devices:** A Customer may use any lawful, compatible type-accepted and commercially available device which they desire on the network provided by DirectLink, as long as such device does not harm the network and is not unlawful.

### **Performance Characteristics:**

Pricing and levels of service provided by DirectLink can be found at [www.directlink.coop](http://www.directlink.coop).

The service type is either a DSL type of service or fiber optic using copper and fiber facilities.

Actual speed tests resulted in an average speed of 19.48 Mbps with an average latency of 2.15 ms. Actual speeds and delay times or latency are impacted by the length, capacity and congestion of transport facilities.

**Privacy:** DirectLink is committed to respecting the privacy of our customers. We strive to provide a safe and secure customer experience. To review DirectLink's Privacy Policy visit <https://www.directlink.coop/legal>

**Terms of Service and Authorized Use:** The commercial terms of DirectLink's access services is set forth in DirectLink's Terms and Conditions. Information on DirectLink's Authorized Use can be found in its Authorized Use Policy. Both documents can be found by visiting <https://www.directlink.coop/legal>

**Amendments/Reservation of Rights:** In the event of any conflict between material found on other links on DirectLink's website and this Open Internet Policy, the more specific terms at the other links shall control.

DirectLink may modify this Policy and other policies it has linked for the customer from time to time at its discretion. Notice of such changes will be posted on this website. However, individual notice to customers, content providers, application providers, service providers or device providers by any means whatsoever shall not be provided unless specifically required to by federal or state law. Notice of changes will be provided in advance normally upon a thirty-day basis. However, DirectLink reserves the right to use a shorter notice period when circumstances so warrant.

**Complaints:** If a customer has complaints about the service, they are urged to contact DirectLink's business office at 503.266.8111. A customer always has the right to file a complaint with the Federal Communications Commission at [www.fcc.gov](http://www.fcc.gov).

**Contact Info:** Any questions related to DirectLink's Open Internet Policy should be referred to Member Services at 503.266.8111.