



Grand River Mutual Telephone Corporation d/b/a GRM Networks Internet Service Disclosure

This disclosure explains GRM Networks' network management practices, performance characteristics, and commercial terms. This disclosure may be changed from time to time without notice (with the date of the last update reflected below). The information provided in the disclosure is not a contract but is designed to provide customers with information to understand GRM Networks' Services and make informed decisions regarding your choice of Internet Services. The disclosure also does not obligate GRM Networks to provide any specific level of service or to maintain any level of service or network configuration, and creates no rights that are not already available to a customer by law or under any agreement with GRM Networks.

Network Management Practices

GRM Networks' Internet access service is provided on a best-effort basis. GRM Networks does not limit, block, or rate-control specific protocols or protocol ports other than for security reasons, or otherwise inhibit or favor certain applications or classes of applications of traffic on our Internet access service.

GRM Networks does not affirmatively manage congestion on the network through mechanisms such as real-time throttling, blocking, or dropping of specific end-user traffic based on source or content. GRM Networks uses generally accepted technical measures to provide acceptable service levels to all customers, such as application-neutral bandwidth allocation, as well as measures to address service attacks, illegal content, and other harmful activities, to protect network integrity and reliability. GRM Networks does not throttle traffic, but does offer different internet packages which limit the speeds a customer can upload and download data from the Internet.

Congestion due to malfunctioning hardware and/or software will be remedied as quickly as network engineers can diagnose and identify the offending hardware/software. Congestion due to malice will be remedied using any technique available, including protocol-aware filtering and rate-limiting, to control and limit the offending source. GRM Networks may seek criminal charges against those who inflict network malice. GRM Networks may also attempt to recover costs incurred from network malice.

GRM Networks does not engage in any practice that directly or indirectly favors some traffic over other traffic, including through the use of techniques such as traffic shaping, prioritization, or resource reservation, to benefit an affiliate or in exchange for consideration, monetary or otherwise.

GRM Networks requires use of our modem, which serves as a gateway to our network and enables trouble shooting up to the modem if needed. Customers may attach any lawful device behind the modem, as long as it does not harm the network or the provision of Internet access service, facilitate theft of service or a violation of our AUP or any terms of service, or harm other users of the service.

GRM Networks implements network security practices and procedures intended to address threats to the network and to GRM Networks' customers. GRM Networks' upstream provider supplies threat mitigation based on proprietary triggers and/or thresholds. GRM Networks further reviews and implements additional threat mitigation procedures. Online activity that violates GRM Networks' terms of service or AUP or otherwise is targeted at or threatens to undermine the integrity or normal operation of GRM Networks' network or services, or the security of customers' networks, may result in suspension or termination of service. GRM Networks reserves the right at any time to take action to protect the integrity and normal operation of the network and to safeguard customers from threats, including fraud and other forms of abuse. Such actions may include, but are not limited to, blocking, redirecting, or rate-limiting traffic using specific protocols, delivered over specific protocol ports, or destined for particular domain names or IP addresses associated with malicious activity.

Performance Characteristics

GRM Networks is in the process of upgrading its copper wireline network to a complete Fiber-To-The-Premise (FTTP) network. Within the exchanges, several different types of equipment are used to deliver high speed connections. Some exchanges are all FTTH and customers can receive up to SuperNet GIG connection speeds. Some are both FTTH and copper/DSL. The customers on the FTTH connections can receive the faster connections but the copper/DSL customers will have limited connection speed options depending on the length of the copper cable between their location and the company equipment. Some exchanges have not yet been upgraded and continue to run on an all copper cable network. Details on which exchanges have fiber and which have copper/DSL can be found at <http://www2.grm.net/internet/>.

GRM Networks' network provisioning and engineering practices are designed to enable its customers to receive the speeds for the packages to which they subscribe. However, it is important to note that many factors beyond GRM Networks' control can affect the actual speeds customers are able to receive on their devices, including:

- Computer performance, including hardware age, software and operating system versions, the presence of viruses and malware, and the number of simultaneous applications running.
- Home network (wi-fi) connections, which may be slower than wired connections.
- Congestion on websites visited, including high demand by multiple simultaneous users.
- Fluctuations in latency within connecting networks outside of GRM Networks' network, such as gaming servers.

Customers may test service speeds and latency using commercial speed tests available online, such as <http://speedtest.net/>. Customers should note that if they choose a GRM Networks server to perform the speed test, the speed will not be rate limited inside the network. Also note that speed tests have biases and flaws, and should be considered only as informational and not a reflection of actual performance. Third party tests may not reliably measure the speed of service, but customers should contact GRM Networks if the third party test consistently measures below the subscribed-to package speed.

Subject to the factors above, the typical performance of GRM Networks' Internet service will approximate or exceed the national wireline broadband Internet speed and latency levels reported by the FCC. Latency should be adequate for common Internet applications. Additional information about the FCC report is available at http://transition.fcc.gov/cgb/measuringbroadbandreport/Measuring_U.S. - Main_Report_Full.pdf.

GRM Networks measures availability, latency, and aggregate utilization on the network and strives to meet internal service level targets. GRM Networks is also required by the FCC to test a random set of customers for speed and latency periodically during the year. This Internet Service Disclosure states that GRM Networks will perform these tests. If additional equipment is required for a selected customer for this testing, GRM Networks will contact the customer to schedule installation of the equipment.

GRM Networks' architecture and related engineering standard are constantly evolving through a long-term, multiyear network upgrade transformation. As such, service types and speeds that GRM Networks offers may vary by location throughout the duration of this transformation.

Commercial Terms

GRM Networks offers multiple residential and business Internet packages providing different maximum downstream and upstream speeds. For information including availability, prices, and fees, see <http://www2.grm.net/internet/>.

GRM Networks does not store Internet traffic, provide it to third parties, or use it for non-network management purposes. GRM Networks employs equipment that is capable of deep packet inspection, but this technique is typically only used for service attack mitigation. GRM Networks' Privacy Policy can be found at <http://www2.grm.net/wp-content/uploads/GRM-Networks-Privacy-Policy-Mar-2015.pdf>.

Consumers with questions or complaints about this policy can contact GRM Networks at 660-748-3231 or email help@grm.net.

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