Open Internet Disclosure Statement

Effective date of disclosure is September 17, 2018.
This document provides information about the network management practices, performance characteristics, and commercial terms applicable to the broadband Internet access services provided to consumers by The Seimitsu Corporation ("Seimitsu") consistent with the Federal Communications Commission ("FCC")'s transparency rule 47 CFR § 8.1(a). Seimitsu's filer registration number (FRN) with the FCC is 0017360827.

Seimitsu provides broadband Internet access service utilizing fiber optic service, and terrestrial fixed wireless. This document covers the provisioning of those services to retail customers.

Seimitsu maintains an open Internet for its customers, and with this principle in mind, this document summarizes Seimitsu's network management practices, performance characteristics, and commercial terms of the broadband Internet access services that it offers to its customers. Nothing in this document changes your rights and obligations, or Seimitsu's rights and obligations, under the terms of service associated with the applicable Seimitsu products and services you subscribe to or Seimitsu's Acceptable Use Policy or Privacy Policy. This document and the information contained in it are provided for informational purposes only and may be changed at any time, without notice.

NETWORK MANAGEMENT PRACTICES

Seimitsu manages its network with the goal of delivering the best possible broadband Internet experience to all Seimitsu customers. The Internet services provided to customers by Seimitsu is obtained through several large Internet access carriers providing wholesale Internet transport services to broadband providers such as Seimitsu. As a result, many of Seimitsu's network management practices and the performance characteristics described in this document may be directed, implemented and monitored by Seimitsu's wholesale Internet access carriers for the maintenance and protection of their own respective networks. References in this document to Seimitsu's actions and policies necessarily include the actions and policies of Seimitsu's underlying carriers for Internet access services using their networks, which Seimitsu and the customers must follow and be subject to in their usage of Seimitsu's Internet services. Accordingly, any reference to Seimitsu below may include upstream Internet access carriers providing services to Seimitsu that Seimitsu incorporates into its offering to its customers.

Protecting and managing the network is essential to promote the use of the Internet by all of Seimitsu's customers. Seimitsu reserves the right to employ reasonable tailored Internet Protocol ("IP") network management practices that are consistent with industry standards for such networks. Such practices would ensure that all customers and application providers have access to a fair share of Seimitsu's network while not unreasonably discriminating in transmitting lawful broadband traffic. Seimitsu and its service providers also try to use tools and technologies that are minimally intrusive but may cause a complete outage for a customer

if the customer's IP address is determined to be under attack. Just as the Internet continues to change and evolve, so too will Seimitsu's network management practices adapt to address the challenges and threats on the Internet. By engaging in reasonable and responsible network management, Seimitsu can enhance its delivery of the best possible broadband Internet experience to all of its customers.

Blocking. So long as traffic is not determined to be, or likely to be, malicious or harmful to its network, Seimitsu does not block certain applications or classes of applications sourced from, or destined to, the public Internet. Rather, Seimitsu strives to provide the best customer experience for all types of applications. Seimitsu and its carriers operate service operations centers that monitor the network for abuse and fraud. When Seimitsu determines either by automated or manual means, the presence of suspicious, malicious, criminal, or abusive traffic, or other activity that violates Seimitsu's Acceptable Use Policy, Seimitsu may (and likely will) temporarily block access from or to its network to protect the security and availability of its network and service to its other customers. This measure may be triggered by, among other conditions, a denial-of-service ("DDoS") attack or by Seimitsu (or its carriers) detecting an unusual amount of traffic that may be related to computers suspected to be infected with malicious software. If a customer believes that Seimitsu is blocking such traffic in error, the customer should contact Seimitsu's customer support at (912) 352-3689, or Dispatch@Seimitsu.com.

Throttling. Seimitsu does not engage in throttling of Internet services except for in aggregate for all traffic destined to a given customer in accordance with the speed package selected. Common speed package and throttling rules are listed below.

Fiber Optic

Small Business	50 Mbps Download	50 Mbps Upload
Business Premium	100 Mbps Download	100 Mbps Upload
Enterprise Premium	500 Mbps Download	500 Mbps Upload

Terrestrial Fixed Wireless

Business Premium	20 Mbps Download	20 Mbps Upload

Affiliated Prioritization. Seimitsu does not engage in affiliated prioritization.

Paid Prioritization. Seimitsu does not engage in paid prioritization.

Congestion Management. Congestion management of Internet services will occur for very basic reasons. All Internet traffic is considered "best effort", and is therefore subject to

congestion management processes by Seimitsu, its carriers and their peer Internet service providers. Internet Service Providers such as Seimitsu use a combination of buffering, "first in first out" tools, multiple upstream connections, and monitoring and pro-active upgrades of upstream connections to accomplish the goal of lessening the impact caused by network congestion. Selection of traffic to delay during times of congestion will be completely random and all customer traffic attempting to access resources located behind the point of congestion, regardless of their bandwidth usage or network application, will be equally subject to the same factors of randomization. Customer traffic is congestion-managed not based on the applications or content being used, but based on current network conditions.

Application-Specific Behavior. Seimitsu does not prevent users of its service from sending and receiving the lawful content of their choice; running lawful applications and using lawful services of their choice; or connecting their choice of legal devices (subject to the discussion below), provided that such applications and services do not harm the network or the provision of broadband Internet access services, facilitate theft of service, or harm other users of the service. Similarly, Seimitsu does not impair or degrade particular content, applications, services, or non-harmful devices.

The broadband marketplace is dynamic and constantly changing. While this document is intended to be thorough and current, Seimitsu expects to continue evaluating its approach to network management in response to changes in technology and Internet usage, and it reserves the right to adopt new or different network management practices.

Device Attachment Rules. Seimitsu permits its customers to attach any device to its network, so long as the device's usage does not harm Seimitsu's network or otherwise violate Seimitsu's Acceptable Use Policy which can be found at http://seimitsu.com/files/uploads/SeimitsuAUP.pdf Not all such devices, however, may be technically compatible with Seimitsu's network. The technical compatibility of a device will vary depending on the broadband Internet access service to which it is being attached.

Security. Seimitsu actively seeks to address the threats posed by harmful and unwanted traffic and thus to protect the security, integrity, and availability of its network and its customers. Malicious software (often referred to as "malware") such as viruses, worms, spyware, and distributed denial of service ("DDoS") attacks not only can adversely affect the network, but also can result in harm to customers' computers and the quality of the service they receive, compromise their data, and harm third parties as well. Unwanted communications such as spam can lead to similar problems.

Seimitsu encourages its customers to protect themselves from malicious Internet content utilizing a wide variety of commercially-available tools such as anti-virus, firewalls, and anti-malware tools. It is the customer's responsibility to initiate and maintain safeguards as to the customer's services and equipment, including adequate and secure passwords, updated operating system and application software, and updated anti-virus, firewall, and anti-malware software and other protections for the customer's equipment applicable to the services.

As discussed in Blocking, Seimitsu may employ certain practices on a case-by-case and as-needed basis to protect its network and its customers against DDoS attacks. These practices could be triggered if Seimitsu detects traffic levels that significantly exceed certain baselines; the applicable thresholds are not disclosed here, in order to ensure that these security practices remain effective and cannot be deliberately circumvented. Further, in accordance with common industry practices (and in response to demonstrated harms), Seimitsu may on occasion and for limited periods of time inhibit certain Internet ports or IP address ranges (often correlated to specific geographic regions) that are commonly misused to harm networks, although this in no way is intended to prevent any Seimitsu customer or broadband Internet access user from accessing lawful Internet content. If a customer believes that Seimitsu is blocking such traffic in error, the customer should contact Seimitsu's customer support at (912) 352-3689, or Dispatch@Seimitsu.com.

PERFORMANCE CHARACTERISTICS

Service Description. Seimitsu offers Internet services to consumers primarily through fiber optic or terrestrial fixed wireless facilities. Both services are subject to availability which is geographically limited. These offerings provide a number of symmetric and sometimes asymmetrical speed profiles. Common speed profiles are listed above in the Throttling section.

As detailed more specifically below, speeds are dependent upon many factors including specific technology deployed for a customer connection. For example, terrestrial fixed wireless speeds can be impacted by wireless interference that may or may not be within Seimitsu's control to identify and resolve. Additionally, other factors, such as the number of devices the customer elects to connect to the Internet modem/router, radio frequency interference within the customer's premise, network congestion, and other factors may also impact performance.

Seimitsu provisions its network to ensure that its customers can enjoy the speeds to which they subscribe. However, Seimitsu does not guarantee that a customer will actually achieve those speeds at all times. No Internet Service Provider can guarantee a particular speed at all times to a customer. Seimitsu 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 Seimitsu. While it is impossible to list all conditions that could possibly affect Internet service, some of the most common are:

- 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, malware and viruses.
- Type of connection between a customer's computer and the (likely Seimitsu managed) router. For example, wireless connections may be slower than wired connections into a router or modem. Wireless connections also may be subject to greater fluctuations, interference and congestion from other common household electronics including, but

not limited to, microwave ovens. Seimitsu does not recommend wireless modem connections for use with its higher speed tiers as many wireless connections typically are not capable of supporting speeds delivered by these tiers particularly when multiple devices are connected to the wireless modem/router. Also, when a customer provides its own router, many older routers, instead of utilizing a Seimitsu managed router, such older routers are likely not capable of supporting speeds delivered on higher speed tier packages.

- 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 the customer's Internet connection.

- Congestion or high usage levels at the website or destination can impact a customer's Internet connection speed. 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.

- Gating of speeds or access by the website or destination may impact a customer's Internet connection speed. 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 and impact their download speeds.

- 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. However, Seimitsu strives to maintain its network such that customers can achieve a latency of less than 100 milliseconds and less than 50 milliseconds to common destinations.

There are numerous products and services available to test Seimitsu's services. These tests are heavily dependent on a customer's home network configuration, modem, and computers, and therefore do not reflect the performance of the Seimitsu network only. In order to test your Internet speed when utilizing Seimitsu's Internet services, www.speedtest.net and select to run a speed test. Seimitsu also may be able to provide testing of the services to assure that customer is receiving the subscribed bandwidth at the demarcation point between Seimitsu's network and the customer's inside wiring. If the tests demonstrate the customer's services are degraded from the speeds delivered by Seimitsu's network, the customer should evaluate problems with the customer's equipment at the premises and any software issues associated with the use of that equipment.

Impact of Non-Broadband Internet Access Service Data Services. Seimitsu offers broadband Internet access service over the same last-mile facilities as specialized services, such as virtual private network ("VPN"), voice over IP ("VoIP"). In most cases, when the specialized service is not being used, customers may use the capacity that would otherwise be used for the specialized service for broadband Internet access. When these customers do utilize the special services, less bandwidth will be available for broadband Internet access service than when they are not using the specialized services.

COMMERCIAL TERMS

Price. The terms of service for Seimitsu's Internet access services are set forth in the materials specific to that service as executed by and between Seimitsu and the Customer when the service was established or ordered. Seimitsu offers various pricing options for its Internet access services depending upon location, bandwidth needs and other terms and conditions.

Current customers can find pricing information concerning their service on their monthly bill or by contacting a customer service representative. Prospective customers can obtain pricing information for Seimitsu's customer service representatives.

Privacy. Seimitsu's does not share customer information with any third parties except for those third parties involved in provisioning or supporting service. Specifically, at times, Seimitsu utilizes a third party to provide support as overflow or additional hours coverage. Seimitsu utilizes a wholesale partner to provide voice services. And Seimitsu utilizes a third party to perform credit card processing.

Redress Options. If you have any questions about Seimitsu's service or any questions or concerns regarding any of the information set forth above and wish to contact a customer service representative may do so by calling Seimitsu's customer support at (912) 352-3689, or Dispatch@seimitsu.com.

CERTIFICATION

This statement has been reviewed by Seimitsu's President & CEO, Seimitsu Cook, SR. who certified that the information contained in the disclosure is true and correct to the best of his knowledge.