

# Broadband Labels Internal Compliance Policy

## For New Windsor Communications

### Background

The Federal Communications Commission's (FCC) requires Broadband Internet Access Service (BIAS) providers to publicly disclose accurate information regarding the network management practices, performance characteristics, and commercial terms of its BIAS services sufficient to enable consumers to make informed choices regarding the purchase and use of such services. The FCC also requires such providers to create and display an accurate broadband consumer label for each stand-alone broadband internet access service it currently offers for purchase. Each label must be prominently displayed, publicly available, and easily accessible to consumers (including consumers with disabilities). It must be available at the point of sale with the following content in the format prescribed by the FCC, below:

<b>Broadband Facts</b>	
<b>Provider Name</b>	
<b>Service Plan Name and/or Speed Tier</b>	
[Fixed or Mobile] Broadband Consumer Disclosure	
<b>Monthly Price</b>	<b>\$00.00</b>
This monthly price is an introductory rate	Yes / No
Time the introductory rate applies	YY months
Monthly price after the introductory rate	\$00.00
Length of contract	YY months
Link to Terms of Contract <a href="https://www.example.com/terms-of-contract">https://www.example.com/terms-of-contract</a>	
<b>Additional Charges &amp; Terms</b>	
Provider Monthly Fees	
Fee description	\$00.00
Fee description	\$00.00
Fee description	\$00.00
Fee description	\$00.00
One-Time Purchase Fees	
Fee description	\$00.00
Fee description	\$00.00
Early Termination Fee	\$00.00
Government Taxes	Included/Varies by Location/\$00.00
<b>Discounts &amp; Bundles</b>	
Visit the link below for available billing discounts and pricing options for broadband service bundled with other services like video, phone, and wireless service, and use of your own equipment.	
<a href="https://www.example.com/discounts">https://www.example.com/discounts</a>	
<b>Speeds Provided with Plan</b>	
Typical Download Speed	000 Mbps
Typical Upload Speed	000 Mbps
Typical Latency	00 ms
<b>Data Included with Monthly Price</b>	<b>000 GB</b>
Charges for Additional Data Usage	\$/GB
<a href="https://www.example.com/data-usage">https://www.example.com/data-usage</a>	
<b>Network Management Policy</b>	
<a href="https://www.example.com/network-management">https://www.example.com/network-management</a>	
<b>Privacy Policy</b>	
<a href="https://www.example.com/privacy">https://www.example.com/privacy</a>	
<b>Customer Support</b>	
Phone:	(555) 555-5555
Website:	<a href="https://www.example.com">https://www.example.com</a>
Learn about the terms used on this label. Visit the Federal Communications Commission's Consumer Resource Center.	
<a href="https://www.fcc.gov/consumer">fcc.gov/consumer</a>	
Unique Plan Identifier: F0005937974123ABC456EMC789	

## **BROADBAND LABEL POLICY**

Our Company hereby enacts the following internal policy and procedures to comply the FCC's requirements.

### **I. DISPLAY.**

- 1.1. The Company will display the broadband label at each point of sale, including websites, retail locations, third-party retail locations, and over the phone.
- 1.2. The Company will display the broadband labels on websites in close proximity to the associated advertised service plan.
- 1.3. The Company will remove a label once the associated service plan is no longer offered to new subscribers; however the Company will abide by applicable retention requirements.

### **II. POINT OF SALE.**

- 2.1. The Company will make the broadband label available to the consumer at the time the consumer begins investigating and comparing broadband service offerings available to them.
  - 2.1.1. For any E-Rate and rural Health Care program Company participates in, the point of sale shall be deemed to be the time at which Company submits its bid to a program participant.

### **III. RETENTION OF DOCUMENTS.**

- 3.1. For all alternative sales channels (i.e. non-website), the Company will document each instance it directs a consumer to a label and retain such documentation for two (2) years.
- 3.2. The Company will satisfy the FCC's required retention of documents requirement by:
  - a. Maintaining these business practices and processes Company will follow in distributing the label through alternative sales channels;
  - b. Retaining training materials and related business practice documentation for two (2) years; and
  - c. Providing such information to the FCC within thirty (30) days, upon request.

### **IV. ARCHIVED LABELS.**

- 4.1. Company will retain its documentation in such a way, and be responsive to an FCC request, such that it will be able to provide any archived label to the FCC within thirty (30) days upon request.
- 4.2. The Company will provide any archived label to an existing consumer whose service plan is associated with that particular label, within 30 days, and upon request.

### **V. LABEL ACCESS.**

- 5.1. If Company, now or in the future, offers online account portals to customers, each customer's broadband label will be easily accessible to the customer in the portal.
- 5.2. The content of the labels will be displayed on Company's website in a machine-readable format.
- 5.3. Company will provide the information in any label separately in a spreadsheet format on its websites via a dedicated uniform resource locator (URL) that contains all of Company's labels. Company will also publicize the URL with the label data in its transparency disclosures required under 47 C.F.R. § 8.1(a).
- 5.4. All labels will be provided in English and any other languages in which Company currently markets its services in the United States.
- 5.5. Company will maintain an archive of all labels for a period of no less than two (2) years from the time the service plan reflected in the label is no longer available for purchase by a new consumer and Company has removed the label from its website or alternative sales channels.