

NONDISCRIMINATION, INTERCONNECTION, AND NETWORK MANAGEMENT POLICY

This policy is set forth in compliance with the requirements for the Middle Mile Broadband Infrastructure Grant Program. Infrastructure Investment and Jobs Act, 60401(d)(2)(B). This policy is intended for Middle Mile Grant funded projects/facilities, subject to exceptions discussed below. This policy only pertains to portions of the network that fall under the NTIA Middle Mile Grant program.

INTERCONNECTION

It is the policy of **Blue Ridge Electric Cooperative** to provide access to Middle Mile Grant (MMG) funded facilities and service at the nodes listed on our Wholesale Fiber Map. Additional nodes may be added per request when technically and economically feasible. New Nodes shall not exceed current or reasonably anticipated capacity limitations. **Blue Ridge Electric Cooperative** shall grant requests on a non-discriminatory basis from parties seeking physical interconnection for the exchange of traffic or connection to the internet. The rates and terms established by **Blue Ridge Electric Cooperative** are reasonable and nondiscriminatory.

For all requesting parties making bona fide requests for interconnection or wholesale services, **Blue Ridge Electric Cooperative** will negotiate in good faith for commercially-reasonable terms and conditions. Telecommunications carriers and Internet service providers seeking information regarding these services are encouraged to contact **Blue Ridge Electric Cooperative** at 864-898-2022.

Blue Ridge Electric Cooperative is further prepared to do the following:

1. Wholesale a direct connection that it has built to the customer (i.e. loop or lateral);
2. Provide transport services to a last mile provider that is serving the customer (e.g. backhaul, internet access).

In accordance with grant requirements, **Blue Ridge Electric Cooperative** will make all reasonable efforts to allow all requesting parties to interconnect with **its** facilities.

If a party requests to interconnect with MMG-funded facilities where no point of interconnection currently exists, the requesting party should bear any reasonable cost to improve the facilities to allow for interconnection.

Blue Ridge Electric Cooperative maintains that all services are provided under reasonable and nondiscriminatory terms. Wholesale services will be provided to customers at **Blue Ridge Electric Cooperative's** standard quality. Provisioning, installation, repair, and maintenance will likewise be provided on the standard terms and conditions made available to all customers.

Blue Ridge Electric Cooperative shall make available and publish how to request information regarding network routes, points of interconnection, and other related matters. Similarly, **BREC** shall publish the process to make service requests of the type contemplated in this policy. Upon receipt of the request, **BREC** must acknowledge within 10 days. Standard rates are to be supplied at the request of interested parties.

Standard terms and conditions of service are to be made publicly available for inspection by interested parties. As required, executed service agreements are to be made available to the grantor.

BREC shall work with approved service providers to enable interconnection to **BREC** facilities. Interconnection may occur at established **BREC** nodes, carrier hotels, and IXP locations. Additional interconnection locations can be negotiated with technically and economically feasible locations along the route upon review of each request and provided that such access does not exceed current or anticipated capacity limitations.

Interconnection services provided:

Carrier Ethernet
Dedicated Internet Access
Co-location/Data Center
Cybersecurity
Data Storage
Private Line
SD-WAN
Wavelength services
Dark Fiber

NONDISCRIMINATION

It is the policy of **Blue Ridge Electric Cooperative** to provide wholesale fiber services on the following bases:

1. Wholesale customers are entitled to access the lawful Internet content of their choice.
2. **BREC** provides standard interfaces.
3. Wholesale customer may use any electronics which meet the **BREC** Standard equipment that does not harm the network.

In addition to the above, **Blue Ridge Electric Cooperative** does not prioritize lawful Internet applications and content over others. **BREC** does not manage, throttle, block or otherwise limit the content of communications traffic transiting its MMG-funded facilities, except to the extent necessary to maintain reliable service and prevent network harm.

Blue Ridge Electric Cooperative's network management policies will be publicly available and are applied consistent with the above principles. **BREC's** network management practices do not involve preferential routing of traffic on the basis of content or provider. **Blue Ridge Electric Cooperative** utilizes neutral traffic routing and enables connections to other carriers and to the public Internet. **Blue Ridge Electric Cooperative** displays its network management policies in a prominent location on its website, and will provide notice of changes to these policies.

NETWORK MANAGEMENT POLICY

Blue Ridge Electric Cooperative uses various tools and industry standard techniques to manage its network and deliver fast, secure and reliable Internet service. **Blue Ridge Electric Cooperative** believes in full transparency and conducts the following as part of its network management practices:

- A. **Congestion Management.** **BREC** monitors the connections on its network in the aggregate on a daily basis to determine the rate of utilization. If congestion emerges on the network, **BREC** will take the appropriate measures to relieve congestion. **Blue Ridge Electric Cooperative's** network and congestion management practices are 'application-agnostic,' based on current

network conditions and are not implemented on the basis of customers' online activities, protocols or applications.

- B. **Network Security. Blue Ridge Electric Cooperative** promotes the security of its network and patrons by protections from such threats as spam, viruses, firewall issues and phishing schemes. As its normal practice, **BREC** does not block any protocols, content or traffic for purposes of network management except that it may block or limit such traffic as spam, viruses, malware, or denial of service attacks to protect network integrity and the security of customers.
- C. **Device Attachment Rules & Application Specific Behaviors.** Except as may be provided elsewhere herein, **Blue Ridge Electric Cooperative** does not currently engage in any application-specific behaviors nor does it employ device attachment rules for its network.
- D. **Monitoring Schedule. Blue Ridge Electric Cooperative** employs a variety of industry-standard tools, applications and devices to monitor, secure and maintain its network, including one or more of the following:
- Network graphing solutions;
 - Software to monitor SNMP network devices;
 - Port monitors;
 - Electronic alert notifications;
 - Diagnostic protocols;
 - Spam and virus protection on inbound & outbound email

EXCEPTIONS

Law enforcement and reasonable network management may require disruptions or decline in service from time to time. **BREC** reserves the right to employ generally accepted technical measures to provide acceptable service levels to all customers.

The terms in this Policy shall not change the parameters of existing facilities, agreements, or non-MMG funded projects/programs. To the extent non-MMG funded projects/programs become a part of the MMG funded project/program, then this policy shall control, subject to further guidance from the grantor.