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Broadband Consumer Labels

Broadband Consumer Labels Purpose: The purpose of this document is to establish guidelines for Citizens Telephone Cooperative dba Citizens (the Company) for displaying, documenting, and archiving Broadband Consumer Labels in accordance with FCC requirements.

Definitions Broadband Consumer Label: The Broadband Consumer Label (Label or Labels) is a "nutrition type label" that provides clear, easy-to-understand accurate information on stand-alone internet services. Labels must include the following: monthly price, introductory rate, length of the contract, one-time fees, early termination fees, typical download speed, typical upload speed, typical latency, data included with the monthly price, network management policy, privacy policy, customer support phone number, and website. Labels are intended to help consumers compare internet service plans that will best meet their needs and budget.

Point of Sale: The provider's website and any alternate sales channels through which the provider's broadband internet is sold, including a provider-owned location, third-party retail location, and over the phone. The Point of Sale also means the time a consumer begins investigating and comparing broadband service offerings available to them at their location.

Online Account Portal: An online portal (E-Care) is where customers can access their account information, current and previous billing statements, specific service offerings, account notifications, etc.

Alternate Sales Channel: A Point of Sale other than a website through which internet service is sold, including a retail office and over the phone.

Procedure: The Labels must be displayed on the company website in close proximity to the advertised broadband service plan and on the consumer Online Account Portal, also known as the eBill site. Displaying the Labels close to the advertised internet service plans will allow customers to easily make a side-by-side comparison of the available options. The Labels must be made available at all Points of Sale including Alternate Sales Channels such as in retail locations and over the phone. Labels will be accessible to people with disabilities at all Points of Sale. Machine-readable Labels will be available on the company website via a link in the Network Management Policy.

Employees will use one or more of the following procedures to distribute the Labels at retail locations:

- 1. Direct the customer on their device to the specific web page where the Labels appear on the company website.
- 2. Email the customer a link to the specific web page where the Labels appear on the company website.
- 3. Provide the customer a printed copy of the Labels.

Employees will use one or more of the following procedures to distribute the Labels over the phone:

- 1. Direct the customer on their device to the specific web page where the Labels appear on the company website
- 2. Email the customer a link to the specific web page where the Labels appear on the company website
- 3. Read the Labels in their entirety verbally to the customer, unless the customer requests otherwise
- 4. Mail the customer a printed copy of the Labels

Access to Labels via the Online Account Portal (eBill): Online accounts will be offered to all customers to provide easy access to the Label for their existing internet service plan. The customer will be able to easily access and review the terms of their existing plan to ensure they are receiving the service and price they agreed upon at the time of purchase.

Training: Training will be given to all employees who could be at the Point of Sale. Training will include information to help employees understand the Labels and the Company's established business practices and processes to follow in distributing the Labels to customers.

Recordkeeping: Labels for plans that are no longer available for purchase by new customers will be removed from all Points of Sale and archived for two years. Such Labels will be provided to existing customers in those plans upon request within 30 days. As an alternative to documenting each customer Label interaction, the Company has established business practices and processes to follow in distributing the Labels through Alternate Sales Channels; will archive training materials, policies, performance testing data, and related business practice documentation for two years; and will provide such information to the Federal Communications Commission upon request, within 30 days.