

CTC & Comcell

Policy on Digital Discrimination of Access

Effective from June 22, 2024

Introduction

Digital discrimination of access is the application of policies or practices which are not justified by genuine issues of technical or economic feasibility, and which differentially impact consumers' access to broadband internet access service based upon income level, race, ethnicity, color, religion or national origin, or are intended to have such differential impact. The Federal Communications Commission (FCC) has issued new rules to prohibit digital discrimination of access. The rules apply to all internet service providers (ISPs) and covers broad areas of deployment of broadband infrastructure, service quality, marketing/advertising and technical service such as provisioning.

Our company is committed to complying with the FCC rules and ensuring that access to our broadband service does not discriminate against any user based on income level, race, ethnicity, color, religion or national origin. We respect the rights and diversity of our users and value their trust and loyalty. We also recognize that digital discrimination of access can harm our reputation, brand, and business performance. Therefore, we have developed this policy to guide our actions and decisions regarding digital discrimination of access.

The FCC Rules on Digital Discrimination of Access

The FCC rules on digital discrimination of access are based on providing service to all customer groups within a service area or planned service area by applying the following principles:

- **Equal Access:** Users must have access to the same type, quality, reliability and price of service as other customers in the local marketplace, where technically and economically feasible.
- **Non-Discrimination:** ISP's, contractor partners, entities facilitating service and entities that otherwise effect consumer access to broadband must not discriminate for reasons of income level, race, ethnicity, color, religion or national origin.
- **Accountability:** Unless service impacts are justified by genuine issues of technical or economic feasibility, ISPs must adopt, implement and utilize policies or practices that do not differentially impact consumer's access to broadband internet access

service based on the protected classes and which are not intended to have such differential impact.

The FCC rules on digital discrimination of access prohibit ISPs and others from engaging in any discriminatory practice identified, except for a genuine economic or technical feasibility basis:

- **Economic feasibility:** Where reasonably achievable as evidenced by prior success by covered entities under similar circumstances, or demonstrated new economic conditions clearly indicate that the policy or practice in questions may reasonably be adopted, implemented, and utilized.
- **Technical feasibility:** Where reasonably achievable as evidenced by prior success by covered entities under similar circumstances, or demonstrated advances clearly indicate that the policy or practice in question may reasonably be adopted, implemented, and utilized.

Our Company Policy on Digital Discrimination

Our company policy on digital discrimination of access is based on the following objectives:

- To comply with the FCC rules and any other applicable laws and regulations regarding digital discrimination of access.
- To respect the users including potential users of our services and to serve all users where technically and economically feasible.
- To provide comparable product offerings, service quality, reliability and pricing for all customers.
- To treat all our users fairly and equally, and to avoid any discrimination based on their income level, race, ethnicity, color, religion or national origin.
- To cooperate with the FCC and other authorities in case of any investigations or complaints regarding digital discrimination.

To achieve these objectives, we have taken the following steps:

- We have updated our policy to reflect the FCC rules and our policy on digital discrimination of access.
- We will implement a practice of reviewing and evaluating our service deployment and upgrade implementation plans based solely on economic and technical feasibility coupled with our area of planned growth or service enhancement.

- We have ensured that our online products and services do not discriminate against any user based on their income level, race, ethnicity, color, religion or national origin. We have also avoided any practices that could discriminate or have the effect of discriminating based upon income level, race, ethnicity, color, religion or national origin.
- We have established and will enforce policies and procedures to address any violations of the policy or the rules. We have also trained and educated our employees and contractors on the policy and the rules, and their roles and responsibilities regarding digital discrimination of access.
- We have designated a person or a team to oversee and monitor the implementation and compliance of the policy and the rules, and to handle any inquiries or complaints from our users or authorities regarding digital discrimination of access. We have also provided our contact information and a feedback mechanism on our website and in our communications with our users.

Conclusion

We believe that our policy on digital discrimination of access is in line with the FCC rules and our company values and vision. We are committed to providing our users with the best online products and services, respecting the individual, and avoiding any discrimination based on the consumer's income level, race, ethnicity, color, religion or national origin. We welcome any feedback or suggestions from our users or authorities on how we can improve our policy or practices regarding digital discrimination of access.