



Network Management Policy

HiLight and the City of Hillsboro are committed to providing our customers with the best online experience possible. HiLight uses reasonable network management practices that are consistent with industry standards and uses tools and technologies that are minimally intrusive. Just as the Internet continues to evolve, so too, will our network management policies. Should HiLight not apply reasonable network management practices our customers could be subject to the negative effects of security attacks, viruses, and spam among other risks resulting in possible degradation of services. You may also access our most current Acceptable Use Policy (AUP) in Section 4 of our Terms and Conditions Service Agreement at [Service Agreement Terms and Conditions | City of Hillsboro, OR \(hillsboro-oregon.gov\)](#).

Network Overview

HiLight operates a state-of-the-art broadband network whereby fiber optic cable is brought past each home and business. HiLight builds a fiber drop from the street to connect to any home or business who purchases services and where access is granted. It should be noted that not all residential apartment buildings and multi-tenant office buildings allow access. The broadband network enables us to bring the benefits of the extraordinary bandwidth carrying capacity of Fiber Optics to each HiLight customer.

Questions, Answers & Information Regarding Our Network Practices

The FCC requires us to provide descriptions of our Network Management Practices to include Application-Specific Behavior Practices, Device Attachment Rules, Security Practices, Performance Characteristics, Privacy Policies and Customer Redress Options.

Congestion Management:

Given the current bandwidth capacity no congestion management practice is required nor is a practice being employed today other than network monitoring. HiLight reserves the right to employ congestion management practices in the future.

Application-Specific Behavior:

Does HiLight block or rate-control specific protocols?

- HiLight does not block certain traffic. However, HiLight does follow industry best practices to filter invalid traffic.

- HiLight does not block any other kinds of traffic. HiLight subscribes to the philosophy of complete network neutrality, and we treat traffic to and from all customers the same.

Does HiLight modify protocol fields in ways not prescribed by protocol standard?

- HiLight does not modify protocol fields not prescribed by protocol standards.

Does HiLight inhibit or favor certain applications or classes of applications?

- HiLight does not inhibit or favor applications or classes of application over its High-Speed Internet/broadband data network. All traffic is treated in a “protocol-agnostic” manner which means management is not based on the applications and is also content neutral.

Device Attachment Rules:

Does HiLight have any restrictions on the types of devices that they allow to connect to the network?

- A customer is limited to one (1) IP address per service port.

If there are restrictions, is there an approval procedure for devices connecting to the network?

- For any questions regarding the types of devices allowed or required customers should contact HiLight Customer Support at (503) 693-4400. While there are no formal approval procedures to get a specific device approved for connection to the network all devices must be UL certified and carry the FCC Part 64 certification.

Security:

What are the practices used to ensure end-user security or security of the network?

- HiLight uses the following practices to ensure end-user security and network security:
 - HiLight utilizes a network configuration feature to protect from spoofing which isolates one user’s hardware from impersonating another user’s hardware.
- The encryption protocols and practices used on the HiLight fiber network follow industry best practices.
- As the Internet evolves so do malware and other types of security exploits. HiLight’s security tools and techniques are evolving to meet the security challenges of a 21st century world.
- HiLight utilizes these protocols and practices to protect and secure HiLight customer data as well as to protect the HiLight broadband network for the benefit of all customers. These protocols allow HiLight to comply with federal CALEA and other Law Enforcement requirements.

What conditions trigger a security mechanism to be invoked?

- HiLight actively monitors the network and a trigger would be finding any instance of unwanted network intrusion on the network. HiLight would block and investigate an intrusion and would refer to Law Enforcement Agencies as needed.

Performance Characteristics:

Service Description:

A general description of the service offered, including Service Technology, Expected and Actual Speeds, Expected and Actual Latency, Suitability of the Service for Real-time Applications follows:

- Service Technology
 - HiLight uses a Fiber to the home (FTTH) access system to deliver broadband services to customers. The FTTH system standard is called GPON (Gigabit Passive Optical Network). Up to thirty-two (32) customers share one fiber in neighborhoods and this shared fiber is called a PON. The GPON system delivers 2,400 Megabits per second to the subscribers on a PON and 1,200 Mbps from the subscribers on a PON.
 - In the HiLight FTTH network there are no electronics between the fiber hut and the customer. No electronics means that there are fewer failure points in the network and superior service quality to our customers.
- Expected and Actual Speeds
 - Each subscriber is provided access to t high speed internet service:
 - HiLight offers High Speed Internet access speeds at 1 Gigabit, 2 Gigabit, 3 Gigabit and 4 Gigabit in both directions. The expected download and upload speeds for these products is rate of 940 Mbps, 1.9 Gigabit, 2.8 Gigabit and 3.8 Gigabit. It is possible for customers to experience slower speeds on the open Internet, but slower Internet speeds are due to the nature of the open Internet and not due to any blockage or congestion on the HiLight network.
- Expected and Actual Latency
 - Latency is another measure 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 (2) points of transmission and is typically measured in milliseconds. The HiLight network is designed to have an operating latency as high as 20 milliseconds. However, in real practice the actual latency is generally around 3 milliseconds or less.
- Suitability of the Service for Real-time Applications

- The HiLight network is one of the fastest and most accessible networks available in the U.S. Customers can achieve the speeds on our network that they subscribe to, 24/7, without slowdowns or blockages on our networks.

System and Network Security

Users are prohibited from violating or attempting to violate the security of HiLight, including, without limitation, (a) accessing data not intended for such User or logging into a server or account which such User is not authorized to access, (b) attempting to probe, scan or test the vulnerability of a system or network or to breach security or authentication measures without proper authorization, (c) attempting to interfere with, disrupt or disable service to any user, host or network, including, without limitation, via means of overloading, flooding, mail bombing or crashing, (d) forging any packet header or any part of the header information in any E-mail or newsgroup posting, or (e) taking any action in order to obtain services to which such User is not entitled. Violations of system or network security may result in civil or criminal liability. We may investigate occurrences that may involve such violations, and we may involve and cooperate with law enforcement authorities in prosecuting Users who are alleged to be involved in such violations.

Suspension or Termination

Any User which HiLight determines, in its sole discretion, to have violated any element of this Network Management Policy shall receive a written warning, and may be subject at our discretion to a temporary suspension of service pending such User's agreement in writing to refrain from any further violations; provided that HiLight may immediately suspend or terminate such User's service without issuing such a warning if HiLight, in its sole discretion deems such action necessary. If we determine that a User has committed a second violation of any element of this Network Management Policy, such User shall be subject to immediate suspension or termination of service without further notice, and we may take such further action as we determine to be appropriate under the circumstances to eliminate or preclude such violation. HiLight shall not be liable for any damages of any nature suffered by any customer, User, or any third party resulting in whole or in part from HiLight exercise of its rights under this Policy. Additional requirements and/or penalties apply as found in HiLight's Acceptable Use Policy (AUP), Section 4 of the HiLight Terms and Conditions Service Agreement.

Service Monitoring

HiLight has no obligation to monitor the services but may do so and disclose information regarding the use of the services for any reason if we, in our sole discretion, believe that it is reasonable to do so, including to satisfy laws, regulations, or other governmental or legal requirements or requests; to operate the services properly, or to protect itself and its subscribers.

Privacy

Any User interacting with our site and providing HiLight with, address, telephone number, E-mail address, domain name or URL or any other personally identifiable information permits HiLight to use such information for commercial purposes of its own, including contacting Users about products and services which may be of interest. All information concerning our users shall be kept in accordance with the HiLight then-applicable Privacy Policy and the requirements of applicable law.

Impact of Specialized Services

What specialized services, if any, are offered to end users?

- HiLight offers one service that could be considered a “Specialized” service over the access system. This service is IP Telephone Service (VoIP).
- VoIP is delivered to customers over a different data segment than the one used for broadband data traffic (including High Speed Internet traffic) and never affect a customer’s access to the open Internet.

Does this specialized service affect the last mile capacity available for, and performance of broadband internet access service?

- Under no circumstances does VoIP affect the performance of the Broadband services.

Network Inspection

Do network management practices entail inspection of network traffic?

. HiLight does not inspect traffic for any other purposes other than to keep track, at the network level, where traffic flows in order to make certain that the network is adequate for the demands of customers.

Is traffic information stored, provided to 3rd parties or used by the ISP for non-network management purposes?

The only time that any stored information is provided to any 3rd party is in response to a court order from a valid and qualified Law Enforcement Agency.

Complaint Redress Options

What are HiLight’s practices for resolving end-user and edge provider complaints and questions?

HiLight first logs all complaints of trouble as a trouble ticket in a trouble log system. This allows for a numeric identification of each trouble reported on the network. Trouble

tickets can be generated by customers or self-generated by alarms located on the HiLight network.

Secondly, HiLight prioritizes each trouble ticket based upon the perceived severity of the problem. For example, outages involving multiple customers are given a higher priority than a minor network glitch affecting one customer.

HiLight attempts to identify and address problems with its Network Administration and Engineering team. If the NOC is unable to clear a reported problem, then a technician in a truck is dispatched to address the problem.

If the problem is of such severity that a field technician cannot solve the problem, the problem is escalated to an engineer. If the engineer is unable to solve the problem, it is generally escalated to an external engineer or consultant or to the vendor that made the equipment in question. HiLight contracts with experienced vendors for troubleshooting and resolution, as needed, in support of the network.

Finally, the customer may be notified depending upon the severity and type of problem.

Record of service issues and related work orders is retained permanently within HiLight's Operations and Support System so that HiLight is able to view a history of trouble at a specific customer site, a specific neighborhood or with a specific brand or piece of equipment.

Treatment of Personal Web Pages and File Storage

Customers and users are solely responsible for any and all information published or stored on Personal Web Pages and/or File Storage and for ensuring that all content is appropriate for those who may have access to it. This includes taking appropriate measures and precautions to prevent minors from accessing or receiving inappropriate content. This includes, but is not limited to, text, photographs, logos, executable programs, video and audio recordings, images, and illustrations. HiLight reserves the right to remove or block content contained on Personal Web Pages/File Storage if HiLight, in its sole discretion, determines that it violates the terms of this Acceptable Use Policy.

Treatment of Inappropriate Content and Transmission

HiLight reserves the right to refuse to transmit or post, and remove or block, any information or materials, in whole or in part, that HiLight, in its sole discretion, deems to be in violation of our posted Policies. While HiLight has no obligation to monitor transmissions or postings made on the service HiLight has the right to monitor these transmission and postings for violations of HiLight Policies and to disclose, block, or remove them in adherence with our Customer Service Agreement and our Acceptable Use Policy (AUP), and applicable law.

To report a violation the HiLight General Manager at (503) 693-4400. To report a child exploitation incident involving the Internet, the HiLight General Manager at (503) 693-4400.

No Waiver/Severability

Any failure of HiLight to enforce this Policy shall not be construed as a waiver of any right to do so at any time. If any portion of this Policy is held invalid or unenforceable, that portion will be construed consistent with applicable law, and any remaining portions will remain in full force and effect.

HiLight reserves the right to modify this Network Management Policy at any time. We will notify you of any material changes via written, electronic, or other means permitted by law, including by posting it on our website. If you find the changes unacceptable, you have the right to cancel the Services. If you continue to use the Services after receiving notice of such changes, we will consider that as your acceptance of the changes.

Effective May 11, 2023