

**Statement of Compliance with Applicable Service Quality Standards and
Consumer Protection Rules – First Step Internet, LLC – June 2016**

1. Service Quality Standards: First Step works to exceed all requisite levels of service quality to customers served through Rural Broadband (RBE) experiment deployments both through automated monitoring and manual random testing. Specifically, throughput to a customer is regularly tested at random times of day in order to ensure that transmission speeds continue to meet or exceed the 10x1 service profile, and automated testing throughout the entire day constantly measures round-trip latency to customers in order to verify that our goal of 100ms or less average RTT (95th percentile) between them and our internet ingress/egress points is maintained. We have based our latency targets, as well as the accompanying testing methodologies, on the method set forth in the FCC's Report and Order from October 31, 2013 (WC Docket No. 10-90, DA 13-2115, ¶19) as our own goals and targets. We are also continually working to improve and refine our tests and procedures to increase accuracy as well as visibility into problems when they arise.

2. Consumer Protection Rules: As a telecommunications carrier and interconnected VoIP provider, First Step is already required to comply with the protection rules set forth in 47 C.F.R. § 64.2001-2011, and we certify our compliance with these rules annually by filing with the Enforcement Bureau under docket 06-36. A copy of our most recent filing, which includes a detailed description of our operating procedures for ensuring compliance, at the FCC Enforcement Bureau's Customer Proprietary Network Information (CPNI) site, <http://apps.fcc.gov/eb/CPNI> – search under our 499 Filer ID (829017) and look for confirmation #46578132. Previous years' annual certifications were filed via the Electronic Comment Filing System (ECFS).