

GREAT LAKES ENERGY CONNECTIONS, INC. dba TRUESTREAM (“TRUESTREAM”)

**OPERATING PROCEDURES
COPYRIGHT INFRINGEMENT**

I. Objective:

Trustream complies with the Online Copyright Infringement Liability Act of 1998 (17 USC 512). As required by that Act, this policy reserves the right for Trustream to terminate the internet service of members who repeatedly infringe copyrights.

II. Policy:

Pursuant the Digital Millennium Copyright Act (“DMCA”), copyright owners may notify a service provider such as Trustream of alleged copyright infringement carried out on the provider’s network.

When Trustream receives a notification of copyright infringement, it will take the following steps:

1. First warning – Letter is sent to member notifying them of their copyright infringement and violation of Trustream’s Acceptable Use Policy (AUP) and Terms & Conditions of Service (T&C). This letter will also inform them that Trustream may suspend or terminate service if violation continues.
2. Second warning – If there is a second offense in 12-month period, a second warning will be sent. This letter will notify the member of their copyright infringement and violation of Trustream’s AUP and T&C. The letter will also inform the member that Trustream may suspend or terminate service if violation continues.
3. Final warning – If there is a third offense in a 12-month period, Trustream will issue a final warning letter to the member. This letter will be sent via certified mail. This letter will notify the member of their copyright infringement and violation of Trustream’s AUP and T&C. The letter will also inform the member that Trustream may suspend or terminate service if violation continues.
4. Notice of termination – If there is a fourth offense in a 12-month period, Trustream will terminate the service and send a letter to the member via certified mail. This letter will notify the member that their account has been terminated effective immediately and that equipment should be returned to Trustream.

Trustream reserves the right act immediately and without notice to suspend or terminate services in response to a court order or other legal requirement that certain conduct be stopped, or when Trustream determines that the conduct may:

- Expose Trustream to sanctions, prosecution or civil action;
- Cause harm to or interfere with the integrity or normal operations of Trustream’s network or facilities;
- Interfere with another person’s use of Trustream Services or the Internet;
- Damage or disparage the reputation of Trustream or its services; or
- Otherwise present a risk of harm to Trustream or Trustream’s customers or their employees, officers, directors, agents, or other representatives.

III. Record Retention:

All Copyright Infringement Notifications and supporting documentation shall be kept in a vault at Trustream headquarters for five years.

All correspondence with the member shall be retained in Trustream’s imaging system for a minimum of five years.

A database that includes, account number, date of notification, etc. will also be kept of all Copyright Infringement Notifications.

IV. Responsibility:

The Chief Operating Officer is listed as the FCC and ISP Designated Agent and will be the primary point of contact for all Copyright Infringement Notifications. This position, with the help of IT and customer support, are responsible for carrying out the steps of this policy.