

# Digital Discrimination Policy

## I. Introduction

At Star Communications (“Star” or “We” or “Our”), we are committed to providing equal access to broadband internet access service for all individuals, irrespective of their income level, race, ethnicity, color, religion, or national origin. This Digital Discrimination Policy (“Policy”) outlines our compliance with Federal Communications Commission (“FCC”) regulations and our commitment to making our services accessible to everyone.

## II. Definitions

- **Digital Discrimination of Access:** Policies or practices not justified by genuine technical or economic feasibility issues that differentially impact consumers’ access to broadband internet access service based on protected characteristics or are intended to have such an impact.
- **Technically Feasible:** Policies or practices that are reasonably achievable as evidenced by prior success under similar circumstances or demonstrated technological advances indicating their reasonable achievability.
- **Economically Feasible:** Policies or practices that are reasonably achievable as evidenced by prior success under similar circumstances or demonstrated new economic conditions indicating their reasonable achievability.
- **Covered Entities:** Entities that provide, facilitate, or affect consumer access to broadband internet access service, including contractors, facilitators, and entities involved in infrastructure maintenance and upgrades.
- **Consumers:** Current and potential subscribers, including individuals, organizations, and groups capable of subscribing to broadband services, are considered consumers.
- **Broadband Internet Access Service:** A mass-market retail service providing data transmission capabilities to and from internet endpoints, including any incidental capabilities enabling the operation of the service, excluding dial-up service.
- **Protected Characteristics:** Personal attributes or traits protected from discrimination under the law, including income level, race, ethnicity, color, religion, and national origin.

## III. Policy Scope

This Policy applies comprehensively to all facets of our operations, encompassing service deployment, technical specifications, terms and conditions of service, and customer interactions. This Policy applies to all employees, contractors, and entities affiliated with Star involved in providing, facilitating, or affecting consumer access to broadband internet services. This includes but is not limited to executives, managers, supervisors, technical staff, customer service representatives, and any other personnel directly or indirectly involved in delivering broadband services. Additionally, this policy extends to third-party contractors, partners, and entities working through partnership agreements or other business arrangements with Star that affect consumer

access to broadband services. Compliance with this Policy is mandatory for all individuals and entities subject to its scope.

#### **IV. Prohibited Conduct**

We strictly prohibit any form of discriminatory conduct, whether intentional or resulting from policies or practices that produce discriminatory effects based on protected characteristics, including income level, race, ethnicity, color, religion, and national origin.

#### **V. Aspects of Service Affecting Consumer Access**

The aspects of service that could affect a consumer's ability to receive and effectively utilize broadband internet access service include, but are not limited to:

- Deployment
- Technical terms and conditions of service, such as policies and practices regarding speeds, capacities, latency, and data caps
- Network infrastructure deployment, reliability, upgrades, and maintenance
- Customer-premises equipment and installation

Non-technical terms and conditions of service, such as policies and practices regarding contractual terms, mandatory arbitration clauses, pricing, deposits, discounts, customer service, language options, credit checks, marketing or advertising, contract renewal, upgrades, account termination, transfers to another covered entity, and service suspension.

#### **VI. Review of Service Offerings**

We review service offerings, customer base, and build-out areas to determine whether services are equitable to all current and potential customers. These reviews help identify any inadvertent disparities or gaps in service coverage and inform our efforts to address them proactively unless technical or economic business constraints prohibit them. These processes establish transparency and accountability in decision-making, helping to mitigate the risk of digital discrimination and facilitate equitable access to our services.

#### **VII. Justification of Policies and Practices**

We require that any policies and practices that may impact consumer access based on protected characteristics be grounded in genuine technical or economic constraints. Thorough documentation of technical and economic feasibility justifications is conducted for service build-outs, upgrades, and areas not selected for expansion. Technical feasibility assessments consider infrastructure limitations, technological capabilities, and operational constraints, while economic feasibility evaluations include projections of income, expenses, net income, expected return on investment, competition, cash flow, market trends, and working capital requirements.

We actively explore and consider less discriminatory alternatives to any policies or practices with potential discriminatory effects, implementing them whenever feasible and reasonably available.

All justifications for policies or practices with potential discriminatory impacts are internally reviewed for compliance with this Policy. Challenges or obstacles to implementing less discriminatory alternatives are carefully assessed to promote transparency and accountability.

### **VIII. Staff Training**

All staff members undergo training on this Policy and related procedures, so employees are aware of their responsibilities in upholding non-discrimination principles and are equipped with the knowledge and skills necessary to implement the Policy effectively. Departmental Managers and supervisors are responsible for staff training and ensuring compliancy of this Policy.

### **IX. Complaint Response Procedure**

We implement a formal Complaint Response Procedure to address any consumer complaints and/or FCC inquiries promptly and effectively. This includes adopting definitive policies and procedures for addressing complaints, conducting and documenting staff training, and integrating consumer responses into existing consumer and public hotlines. Periodic reviews of complaints are conducted quarterly so that any concerns are addressed in a timely manner. We thoroughly document our responses to consumer complaints, demonstrating how concerns have been addressed and resolved.

### **X. Conclusion**

At Star, we are dedicated to complying with FCC regulations and eliminating digital discrimination of access in all aspects of service provision. Our commitment to equal access underscores our mission to serve all individuals and communities with fairness and integrity.