



Political Spending Policy & Disclosure

Windstream's Policy on Oversight and Transparency for Political Spending

Windstream's Board of Directors oversees corporate political spending. At least annually, Windstream will brief its Governance Committee on the company's corporate political activity, including the spending of treasury funds and and/or funds from the Windstream Corporation political action committees. Further, prior to funding any independent expenditure, Windstream shall obtain the approval of its Governance Committee.

Windstream is committed to transparency in its political activities. The company complies with federal and state regulatory reporting requirements, including required filings made with the Federal Election Commission (FEC) and analogous state entities. This information is supplemented by voluntary disclosures on the Investor Relations website, thus offering shareholders and the public a comprehensive view of Windstream political activity.

Windstream has not funded independent expenditures and does not plan to fund independent expenditures as part of its political program. Consistent with its commitment to transparency, Windstream will be fully transparent if it funds independent expenditures in the future.

Windstream will also provides transparency on its relationships with major trade association memberships. The company will post on its website the name of all trade associations receiving more than \$50,000 a year in Windstream membership dues. In addition, for trade associations that are not primarily engaged in telecommunications regulatory matters, Windstream will provide the annual payment amount for the preceding year.

Windstream is active in the governance of its major trade associations and encourages them to provide transparency for their political campaign contributions and to decline to make independent expenditures. The company does not, however, condition membership in a group or association based on the group or association's policy on reporting independent expenditures.

Windstream is committed to transparency in its political activity. Following is an accounting of the company's efforts in 2012.

Campaign contributions – Windstream made three contributions to candidates and political parties in 2012. No other contributions were made with corporate funds. They were:

- \$5,000 to the Republican Party of Arkansas
- \$5,000 to the Democratic Party of Arkansas
- \$1,000 to Arkansas Lt. Governor Mark Darr

In addition, Windstream has formed 3 political action committees (PACs), each funded 100% with voluntary contributions from employees. The Arkansas and Florida PACs operate exclusively in their respective states; neither PAC made contributions in 2012. The Windstream Corporation PAC contributes primarily to candidates for the U.S. Senate and House of Representatives, but also makes contributions to state and local candidates, where permitted. During 2012, the Windstream Corporation PAC contributed approximately \$112,000 to Congressional candidates; \$34,000 to state and local candidates; \$5,000 to the USTelecom PAC; and \$2,500 each to the Democratic Senate Campaign Committee and the National Republican Senatorial Committee. Detailed information on the activity of all three PACs is available online:

- Federal Election Commission -- <http://query.nictusa.com/cgi-bin/fecimg/?C00425975>
- Arkansas Secretary of State -- http://www.sos.arkansas.gov/filing_search/index.php/filing/search/new
- Florida Division of Elections -- <http://election.dos.state.fl.us/campaign-finance/cam-finance-index.shtml>

Independent expenditures – Windstream made none in 2012

Trade associations – Outside of telecom, Windstream has no major memberships. A major membership is defined as at least \$50,000 in annual dues. The company's most significant non-telecom membership in 2012 was to the Business Roundtable.

In 2012, Windstream paid at least \$50,000 to four organizations that focus on telecom regulatory and policy issues:

- the United States Telecom Association,
- the Ohio Telecom Association,
- COMPTEL, and
- the Pennsylvania Telephone Association.

These organizations focus narrowly on telecom regulatory matters. For competitive reasons, Windstream does not itemize its dues payments to such groups. Windstream is active in the governance of its major trade associations and encourages them to provide transparency for any political campaign contributions and to decline to make independent expenditures.