

# **CPNI**

**“Customer Proprietary Network Information”**

*Interstate 35 Telephone Company  
Procedures*

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## **CPNI Shared Among Affiliated Companies:**

The company procedures document often refers to “The Company.” Where the context requires, “The Company” consists of the Parent Company and its Affiliated Companies which are listed below.

### **Parent Company:**

**Interstate 35 Telephone Company, d.b.a. Interstate Communications**

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### **Affiliated Companies:**

1. Southwest Telephone Exchange
  2. Interstate Enterprises
  3. Iowa RSA 1 Limited Partnership, d.b.a. Cellular 29 Plus
  4. Iowa RSA 2 Limited Partnership, d.b.a. Lyrix Wireless
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## I. CPNI Shared Among Affiliated Companies

The Company and Affiliated Companies may share CPNI with and among Affiliated Companies in order to better market communications-related services to existing customers. This will be done in accordance with the CPNI Rules and all questions regarding application of these rules should go to the CPNI Compliance Officer. Employees will only access The Company or an Affiliated Company's CPNI when working for that specific company and with specific services, except in the scenarios listed below.

The Company and Affiliated Companies may share CPNI with and among The Company and Affiliated Companies **without** customer approval when marketing the same services from which the CPNI was taken. For example, if the customer subscribes to The Company's local telephone and long distance services and those two services are provisioned through two Affiliated Companies, The Company may share CPNI with an Affiliated Company to market a better bundle or new package of those two services. The Company will not share CPNI with an Affiliated Company without customer approval if the customer does not already subscribe to the Affiliated Company's service.

The Company and Affiliated Companies may share CPNI with and among Affiliated Companies **with** customer approval when marketing services the customer may not already subscribe to at that time. In connection with any services to which the customer does not already subscribe, The Company must have a customer's Opt-In or Opt-Out approval in order to share their CPNI with and among Affiliated Companies. If a customer has not given Opt-In or Opt-Out approval, the customer's CPNI will not be shared with or among Affiliated Companies.

The Company has established and will maintain a system by which a customer's CPNI approval can be clearly established prior to the use of CPNI. The Company will follow all other marketing procedures set forth in Section IV.C. of this document when sharing information with and among Affiliated Companies.

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## II. General Statement of Corporate Policy

It is the policy of The Company to adhere to the legal requirements set forth in 47 U.S.C. §222 of the Communications Act and the FCC Rules set forth in 47 C.F.R. §64.2001 through 64.2011 (the “CPNI Rules”). Each employee of The Company who has access to CPNI will be aware of the rules and safeguards in place. If any circumstances arise where an employee of The Company is unsure of how to apply the rules, they should bring the issue to the CPNI Compliance Officer. Where a gray area exists, The Company will **always err** on the side of caution in order to safeguard CPNI.

The Company will only grant access to CPNI to employees who need access and those employees should not use, disclose, or permit access to CPNI except as permitted in The Company procedures.

The following pages of this manual state in more detail how The Company plans to adhere with the CPNI Rules. Each employee is expected to read and comprehend the manual in its entirety. If clarification needs to be made on any section of the manual, the employee should bring it up with the CPNI Compliance Officer.

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### **III. Protection of Carrier Information**

The Company will only use proprietary information received from another carrier for its intended purpose and as permitted or required by applicable law. For example, The Company will never use information from another carrier for its own marketing when it was intended for provisioning telecommunications services.

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#### **IV. Acceptable Uses of CPNI**

The FCC has allowed companies to treat call detail and non-call detail CPNI differently; however, it will be The Company's policy to apply call-detail safeguards to all forms of CPNI *except as explicitly stated otherwise in this section*.

Employees may use, disclose, or permit access to CPNI in the following situations.

##### **A. General Uses of CPNI Without Prior Customer Approval**

The Company will comply with legitimate requests made by law enforcement for CPNI. Employees who receive these requests should immediately notify the CPNI Compliance Officer. It is the CPNI Compliance Officer's responsibility to seek legal counsel (if needed) and respond to the request.

The Company may use, disclose, or permit access to CPNI directly or indirectly through its agents to -

- Initiate, render, bill, and collect for telecommunications services.
- Protect the rights or property of the carrier, or to protect the users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.
- Provision inside wiring installation, maintenance, and repair services.
- Conduct research on the health effects of CMRS.
- Provide call location information concerning the user of a commercial mobile service -
  - To a public safety answering point, emergency medical service provider or emergency dispatch provider, public safety, fire service, or law enforcement official, or hospital emergency or trauma care facility, in order to respond to the user's call for emergency services.
  - To inform the user's legal guardian or members of the user's immediate family of the user's location in an emergency situation that involves the risk of death or serious physical harm.
  - To providers of information or database management services solely for purposes of assisting in the delivery of emergency services in response to an emergency.

Any questions that arise with one of the points above should be brought to the CPNI Compliance Officer.

#### **IV. Acceptable Uses of CPNI (cont.)**

##### **B. Customer Requests for CPNI**

When an employee receives a request from the customer for their CPNI, the employee should determine how the request was made (phone, email, in person) and then follow the proper procedures detailed below in order to complete the customer's request in compliance with the CPNI Rules. If the employee has any questions about

how to handle a request for CPNI, they should bring that question to the CPNI Compliance Officer.

## 1. Customer Initiated Telephone Requests for CPNI

When a customer makes a request or has a question over the phone regarding CPNI, The Company will only provide the information through one of the two methods listed below. It will be up to the customer which option they would like The Company to use.

If the customer is able to provide the CPNI in question without any assistance, (**follow Step 1 and/or Step 2 below**). The Company must authenticate the customer and respond to their request through one of the two methods.

1. The Company may send the information requested to the customer's "address of record." The "address of record" could be either the mailing address of record or a pre-established electronic address of record which has been associated with the customer's account for at least thirty (30) days.
2. The Company may call the customer back at their "telephone number of record." The "telephone number of record" is the telephone number associated with the customer's underlying service and **not** an alternative number designated as a customer's "contact information."

If the customer requests call detail CPNI, the employee should complete a "**Call Detail Request Form**" (found in The Company's CPNI binder) and use one of the methods above to complete the request. The Company will not provide CPNI to a designated person unless the customer submits a written request and The Company follows its procedures set forth in [section IV.B.3](#).

## 2. Carrier Retail Location Requests for CPNI

When a customer makes a request for CPNI at The Company's retail location, The Company will request to see a government-issued photo ID (driver's license, passport, etc.) that is not expired. The ID must match the name listed on the account or someone listed as an authorized user on the account.

If the customer requests CPNI at The Company's retail location, the employee should ask the customer to complete a "CPNI Request Form" (found in The Company's CPNI Manual) and follow the procedures set forth in section IV.B.3.

If the customer is able to provide the CPNI in question without any assistance, The Company can proceed without authenticating the customer. However, if any additional information is needed in order to assist the customer and the customer cannot provide that information (or the customer could not initially provide all the needed information), then The Company must authenticate the customer and respond to their request after the customer produces a valid photo ID. The customer would have the option to request the information be sent to their postal or electronic "address of record" if they did not have a photo ID with them.

### **3. Written Requests for CPNI**

When the customer submits a valid written request for disclosure of their CPNI, The Company will provide the CPNI to the person designated on the request form. Customers should be encouraged to make all written requests via the “CPNI Request Form” found in the CPNI Manual. An employee should honor a written request in any other form if approved by the CPNI Compliance Officer.

If the customer or authorized user on the account is requesting information for their own use, The Company will either send the information to their mailing or electronic address of record or provide the information in person after a valid ID is presented. If the customer or authorized user on the account wants The Company to disclose their CPNI to a designated person, we will first verify the request with a phone call to the telephone number of record, send a verification letter to the customer’s mailing or electronic address of record, or the customer may present a valid ID at our retail location. If the request is confirmed, we will provide the CPNI to the designated person.

- 4. Business Customer Exceptions – There are no Business Customer Exceptions**
  - a. All Customers will be authenticated in accordance to CPNI policy.**

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## V. Customer Notification of Account Changes and Breaches

The Company will notify customers of all applicable account changes and breaches to their CPNI as detailed below. Any questions regarding these two issues should be brought to the CPNI Compliance Officer.

### a. Account Changes

The Company will notify an existing customer immediately. (Mary Pries) if address of record is created or changed. The Company will not notify a customer of these changes when he/she initiates service. All notices will only inform the customer that a change was made and will not include any specific information regarding the change such as the new address. The Company may notify the customer of the change in any one of the following ways:

- i. The Company may send a letter to the customer's address of record.
- ii. The Company may send a letter to the customer's electronic address of record. The Company will only send this information to the electronic address of record if the customer has established this address and it has been on file for at least thirty (30) days, and the customer has given express, verifiable approval to send notices via email.

### b. Customer CPNI Breaches

The Company will take all preventive measures in order to protect customers' CPNI; however, if The Company can reasonably determine that a breach of a customer's CPNI has occurred, The Company will alert law enforcement by sending electronic notification through the designated central reporting facility – <http://www.fcc.gov/eb/CPNI>. The Company will adhere to the following timetable set by the FCC when reporting these breaches.

- i. The Company will report breaches to the central reporting facility within seven (7) business days of reasonably determining a breach has occurred.
  - ii. The Company will notify the customer that a breach to their CPNI has occurred no earlier than seven (7) full business days after notifying law enforcement.
- Law enforcement may request that The Company wait longer than seven (7) full business days if they feel that customer notification would impede the investigation.
  - The Company may, if it feels necessary, **request** to notify the customer earlier than seven (7) full business days after notifying law enforcement. The relevant investigating authority must grant this request before The Company may notify the customer.

Employees should immediately notify the CPNI Compliance Officer if they have any reason to believe a breach has occurred. The CPNI Compliance Officer should seek legal counsel in the event of a breach.

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## **VI. Recordkeeping**

The Company recognizes that the FCC has placed the burden of proof on The Company in all CPNI discrepancies. The Company also recognizes that there are specific CPNI rules in place regarding minimum retention periods for various documents such as Opt-Out agreements, marketing campaigns and customer complaints. The Company will maintain a list of documents and their retention periods in the CPNI Manual, which mirror FCC rules and will retain documents in accordance to that list. All records will be stored in a manner that complies with Section VIII. Any questions regarding this section should be brought to the CPNI Compliance Officer.

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## **VII. Employee Training and Discipline**

The FCC requires that every company train their personnel on CPNI and also create an express disciplinary process for employees who fail to adhere to the CPNI Rules.

### **A. Employee Training**

All employees will be trained as to when they are and are not authorized to use CPNI. The amount of training an employee receives may depend on their access level and use of CPNI on a daily basis. All training questions should be brought to the CPNI Compliance Officer.

- Employees will be required to read The Company's CPNI Procedures document. The employee will sign that he/she has read and understands the policies that are in place and is able to comply with those procedures. The signed documentation will be kept in The Company's CPNI Manual.
- The Company will have CPNI updates at least once a year or when new rules become proposed or effective in order to keep affected employees up-to-date. Documentation of these updates will be kept in The Company's CPNI Manual.
- *The Company has made or may make a third party training session available to its employees during which employees can be trained on CPNI. Documentation of third party training sessions will be kept in The Company's CPNI Manual.*

### **B. Employee Discipline**

The Company will discipline the employee when he/she fails to adhere to The Company's CPNI procedures and the measure of discipline taken will depend on the level of CPNI misuse. Employee discipline measures will include any reasonable discipline actions, in accordance to normal Company policy, up to and including employee termination.

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## **VIII. Security of CPNI Data**

- The Company will take reasonable measures to discover and protect against activity that is indicative of pre-texting, (the practice of pretending to be a particular customer or authorized person to obtain access to that customer's call detail or other private communications records) and in any instance where an employee feels that a CPNI file may have been misused or a breach may have occurred, they should immediately notify the CPNI Compliance Officer.
- As of January 2007, pre-texting is a federal offense.

The Company recognizes that the security of their files containing CPNI is of the utmost importance. Employees who have access to CPNI whether on the computer or through paper files are to practice extreme caution when accessing and using that information. The Company will protect CPNI data in the following ways.

### **A. Electronic Files**

- Files and electronic databases will not be stored or used on any public network.
- Files and electronic databases will always be protected by a password.
- Only employees who need access to the electronic files and databases will be granted access to that information.

### **B. Paper Files**

- All paper files containing CPNI will be kept in a locked filing cabinet or some other locked storage device or facility.
- Only employees who need access to the paper files will be granted access to that information.

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## **IX. Definitions**

### **Account Information:**

Information that is specifically connected to the customer's service relationship with the carrier, including such things as an account number or any component thereof, the telephone number associated with the account, or the bill's amount.

### **Address of Record:**

The address that the carrier has associated with the customer's account. The address must be on file for at least thirty (30) days.

### **Affiliate:**

An entity/person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another entity/person. The term "own" means to own an equity interest (or the equivalent thereof) of more than 10 percent.

### **Breach:**

Occurs when a person, without authorization or exceeding authorization, has intentionally gained access to, used or disclosed CPNI.

### **Call Detail:**

Includes any information that pertains to the transmission of specific telephone calls including, the number called or where the call came from, and the time, location, or duration of any call.

### **CPNI:**

Account Information Call Detail and other non-public, personally identifiable information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications services subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. Examples: Sensitive personal information; phone numbers called; time, date and duration of calls; how much a customer spends monthly; type of network a consumer subscribes to; calling patterns; optional services used; frequently called states, numbers, etc.; and for business customers it could include line size.

### **Electronic Address of Record:**

The electronic address (email) the carrier has associated with the customer's account. The address must be on file for at least thirty (30) days and the customer must have given express, verifiable approval to send notices via email.

### **Non-Call Detail:**

Any CPNI which does not fall under the category of call detail. Examples would be: remaining minutes of use, call forwarding, call waiting, billed amount, other information relating to the customers account.

**Readily Available Biographical Information:**

Includes such things as the customer's social security number, or the last four digits of that number; the customer's mother's maiden name; a home address; or a date of birth.

**Subscriber List Information:**

Any information (a) identifying the listed names of subscribers of a carrier and such subscribers' telephone numbers, addresses, or primary advertising classifications (as such classifications are assigned at the time of the establishment of such service), or any combination of such listed names, numbers, addresses, or classifications; and (b) that the carrier or an affiliate has published, caused to be published, or accepted for publication in any directory format.

**Telephone Number of Record:**

The telephone number associated with the underlying service, not the telephone number supplied as a customer's "contact information."

**Valid Photo ID:**

A government-issued personal identification with a photograph such as a current driver's license, passport, or comparable ID that is not expired.

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## X.

### CPNI Frequently Asked Questions

#### Kiesling Associates, LLP

- 1. Do we have to wait 30 days before we can send any information to a customer's new address?**

Technically, in order to qualify as the "address of record" the address (whether electronic or postal) has to have been associated with the customer's account for at least 30 days.

- 2. Is patronage considered CPNI and could a lawyer just call the company to receive those amounts for his clients?**

The conservative approach would be to consider patronage amounts CPNI. Unless the lawyer has legal documentation that he has the right to his client's information or has a valid written request for this information from his client, you should only mail this information to the customer's "address of record" or call the customer's "telephone number of record."

- 3. If we get a change of address notification from the post office, do we have to send a change of address to the customer's old account?**

The FCC rules are clear on this. Notice of any account change, including address changes, must be given immediately and must be given by calling the telephone number of record or by sending to the address of record. The notice may not reveal the changed account information and may **not** be sent to the new address, even if the post office has returned the notice sent to the address of record. You would not be required to re-send the notice if the post office returns it. It would be in your best interest to keep the notice from the post office for documentation. You also have two other options to notify your customers, call their number of record or send the letter to their electronic address of record.

- 4. What kind of documentation should we see from someone to confirm that a customer died or is unable to make their own decisions and this person can make decisions on behalf of our customer?**

If the customer has died, you should require a "*Letter of Appointment*" (or the equivalent to) before you make any changes/updates to the customer's account. If someone wants to act on behalf of your customer's account, you should require a "*Power of Attorney*" (or the equivalent to) before allowing that person to make any changes/updates to your customer's account.

- 5. If the account is listed under both spouses' names, can one spouse take the other off the account?**

If both spouses' names are listed on the "account," you should have consent from both spouses to take one name off; however, the rules do not specifically address this situation. On the other hand if one of the spouses' names is just listed as an authorized user of the account, the spouse with their name on the account would be able to remove the other spouse as an authorized user.

**6. Are unpublished numbers considered subscriber list information?**

Unpublished numbers are not considered subscriber list information because it is not public information. Cellular phone numbers are non-published and are not public information.

**7. Do we have to authenticate everyone even if we know who they are?**

The rules do not allow you to only authenticate certain customers. *They require each company to authenticate every customer when requesting CPNI.* The FCC has given a couple options to authenticate a customer, but still mandates that in some way your customer is authenticated.

**8. When I install a new line of service do I need to have the, “Adding Authorized User Account, form filled out?**

The customer needs to be asked whether they have already filled out this form. If not, ask the customer if they would like to add other authorized users to their account or establish an E-mail address of record.

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**XI – A**

**Call Detail Requests**  
Employee Completed

Customer Name: \_\_\_\_\_ Date: \_\_\_\_\_

Address of Record: \_\_\_\_\_  
\_\_\_\_\_

Telephone Number of Record: \_\_\_\_\_

How did the customer initiate the request for Call Detail?

Phone:  Email:

Time Period(s) of Records Requested: \_\_\_\_\_  
\_\_\_\_\_

How did the customer want to receive these records?

U.S. Mail:  Email:  Customer Pick-Up:

How was the request for Call Detail verified?

Letter to the Postal/Electronic Address of Record:   
Called the Telephone Number of Record:   
Authorized Customer presented a valid ID:

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

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**XI. – B**

**CPNI Requests**  
Customer Completed

Customer Name: \_\_\_\_\_ Date: \_\_\_\_\_

Address of Record: \_\_\_\_\_  
\_\_\_\_\_

Telephone Number of Record: \_\_\_\_\_

CPNI Requested: \_\_\_\_\_  
\_\_\_\_\_

Time Period(s) of CPNI Requested: \_\_\_\_\_  
\_\_\_\_\_

Who is receiving these records?

Customer Authorized on the Account:

If the customer, how did you want to receive these records?

U.S. Mail:       Email:       Customer Pick-Up:

\_\_\_\_\_  
Customer Signature

\_\_\_\_\_  
Date

How was the request for CPNI verified? (Completed by company representative)

Letter to the Postal/Electronic Address of Record:

Called the Telephone Number of Record:

Authorized Customer presented a valid ID:

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

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**XI. – C**

August 1, 2011

**Customer Change Notification Form**

Interstate 35 Telephone Company has received a request to make the following change(s) to your telephone account. If you did not authorize the change(s) to your telephone account, you **MUST** notify us immediately. If you do not contact us, the change(s) will become effective thirty (30) days from the date on this letter.

Change(s) Requested:

Postal Address Changed  
Electronic Address Changed  
Online Account or Password Change

If you did NOT request the change(s) above, please call us at 641-765-4201

Thank You,

Interstate 35 Telephone Company

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**XI. – D**

**Adding Authorized Users to Account**

Under the new FCC rules governing the use and disclosure of Customer Proprietary Network Information (CPNI), Interstate 35 Telephone Company will only be allowed to discuss CPNI at our business office location with those listed as an authorized user on the account and carrying a photo ID. The only exceptions may be for certain routine customer service issues if you have all pertinent information with you, such as the bill or call detail information you wish to discuss. **Remember, CPNI includes call detail information and certain account information, including the amount of your bill.** For telephone inquiries, other rules dictate how we authenticate a customer. In order to make your experience with Interstate 35 Telephone Company the best possible, we want to give you the option of adding authorized users to your account. Adding an authorized user does not mean that their name(s) will show up on the bill, but only that these persons will be allowed to discuss CPNI with our company representatives. Please take this opportunity to complete the section below and mail it back to us in the provided envelope.

**Authorized Users to Add to Account:**

\_\_\_\_\_  
(Print Name)

\_\_\_\_\_  
(Print Name)

\_\_\_\_\_  
(Print Name)

\_\_\_\_\_  
(Print Name)

**IMPORTANT:** By signing below, the customer is providing the company with express, written approval to communicate via the designated e-mail address in connection with service and account inquiries made by the account owner or designated account users. This approval includes responses to inquiries related to the customer's services generally and specifically to inquiries concerning call detail information and account information, including Customer Proprietary Network Information.

**Establishing an E-mail Address of Record**

Under the new FCC rules governing the use and disclosure of Customer Proprietary Network Information (CPNI), there are certain circumstances under which Interstate 35 Telephone Company may be permitted to respond to your inquiries regarding call detail information or certain account information only by calling the telephone number listed on the account or sending such information to the mailing address or electronic address of record. Your mailing address of record is the billing address for your account. If you wish to establish an electronic address of record, you must notify us of the e-mail address you want to designate as your electronic address of record. **In order to be considered an electronic address of record, the designated e-mail address must be on file with the company for at least thirty (30) days.** This form will establish an e-mail address as an electronic "address of record" only for purposes of service and account inquiries, including inquiries relating to CPNI. This form will not change the billing address for your account. If you wish to establish an electronic address of record for service and account inquiries, please take this opportunity to complete the section below and mail it back to us in the provided envelope.

**Designated E-mail Address for Account Inquiries:**

\_\_\_\_\_ @ \_\_\_\_\_ . \_\_\_\_\_  
(Print Address)

**IMPORTANT:** By signing below, the customer is expressly requesting that the company share certain account and call detail information, including Customer Proprietary Network Information, with authorized account users and is authorizing the company to share such information with authorized users as necessary to address service and account inquiries initiated by the account owner or any authorized user.

-----

\_\_\_\_\_  
Account Owner (Print)

\_\_\_\_\_  
Signature

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date

\_\_\_\_\_  
Your Phone Number on Account

**Interstate 35 Telephone Company \* 105 N West Street \* Truro, IA 50257 \* PH.641-765-4201**  
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**XI. – E**

## **Notice of CPNI Breaches**

Date that the breach was discovered:

\_\_\_\_\_

Date that you notified law enforcement through the central reporting facility:

\_\_\_\_\_

Date that you notified your customer of the breach:

\_\_\_\_\_

Please give a detailed description of the CPNI that was subject to the breach:

Please describe the circumstances of the breach or how the breach occurred:

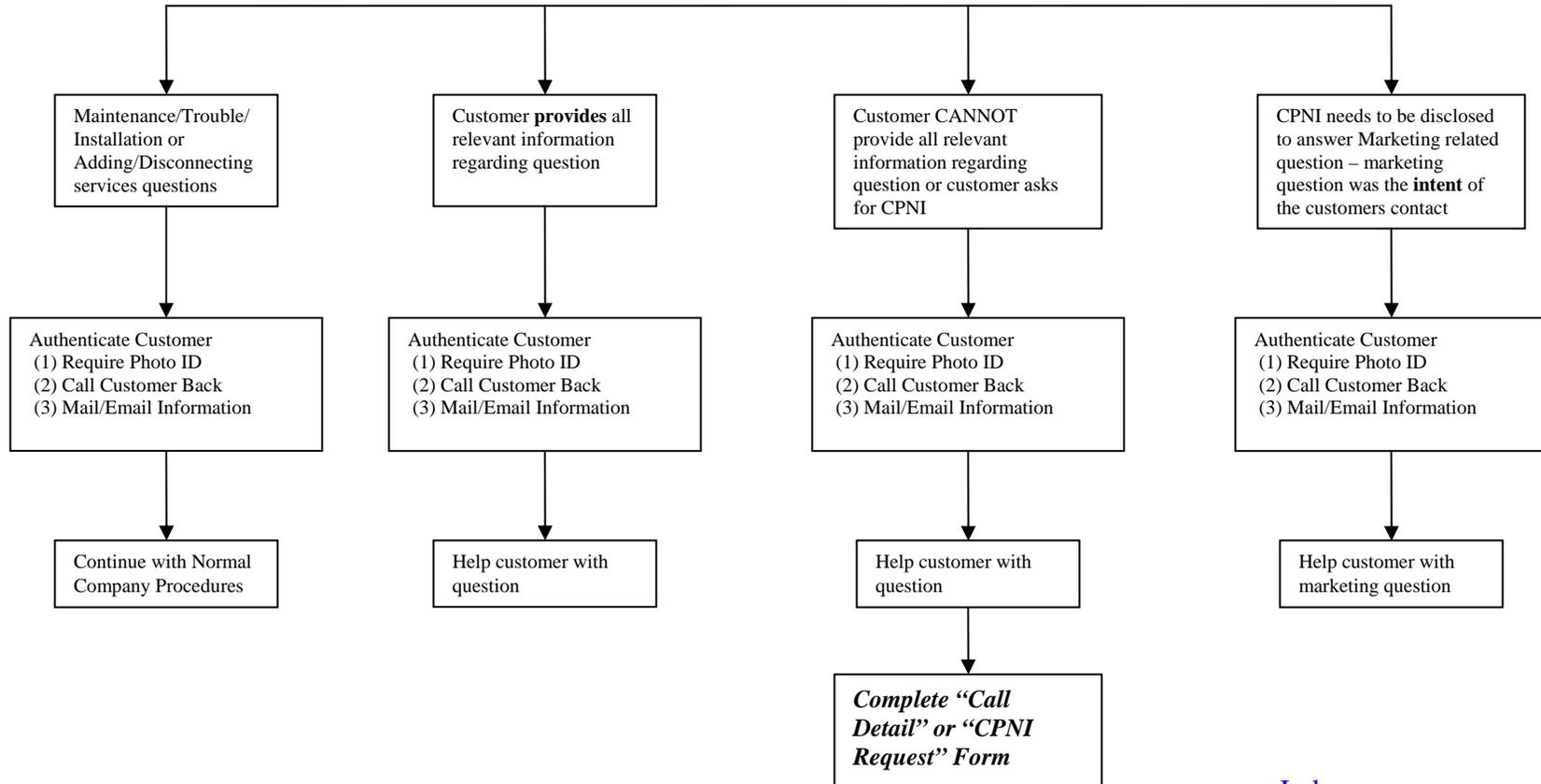
Attach any documentation of the breach, such as your notifications to law enforcement and your customer. If the documentation includes CPNI, keep in a secure file.

\_\_\_\_\_  
CPNI Compliance Administrator /  
Officer's Signature

\_\_\_\_\_  
Date

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**CPNI Flow Chart**  
Customer Initiated Contact



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\*If you choose to market services to your customer and that was not the intent of the call, you MUST ask permission to view their account and then note their One-Time approval in your company records\*\*  
 \*All postal/electronic address, or changes after initial service application require customer notification to be sent with a copy to be retained in company files. \*\*

## **XII. Employee CPNI Certification Form**

I hereby state that I have received a copy of The Company's Customer Proprietary Network Information (CPNI) procedures. I have read and comprehend the contents of this document and understand that I am responsible to adhere to The Company's CPNI procedures. I recognize that a violation of these policies may result in any reasonable disciplinary action up to and including my termination.

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Print (Legal name)

---

Signature

---

Date

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XIII. Annual CPNI Certification

**CPNI Compliance Officer Acknowledgement**

The Company is a telecommunications carrier subject to compliance with certain federal statutes and regulations, including requirements and regulations governing the Company's use and disclosure of customer proprietary network information ("CPNI") pursuant to the Communications Act of 1996 and the Federal Communications Commission ("FCC") rules at 47 C.F.R. §§ 64.2001 – 64.2011 (collectively, the "CPNI Regulations").

Subject to the control and oversight of the Board of Directors, the authority and responsibilities of the Compliance Officer include the approval, implementation and oversight of The Company's CPNI compliance policies and procedures and such other duties as from time to time may be assigned to him or her by the Board of Directors. Without limiting the preceding, the Compliance Officer is hereby authorized, as an agent of The Company, to sign and file with the FCC an annual CPNI compliance certification as required by 47 C.F.R. Section 64.2009(e).

The Company's Compliance Officer, as an authorized agent of The Company, is responsible for approving, implementing and overseeing The Company's compliance with the operating policies and procedures set forth in this manual. These responsibilities include but are not limited to: employee training, marketing procedures, managing customer CPNI disclosure, and overseeing CPNI recordkeeping. Any and all employee questions regarding CPNI should be directed to the Compliance Officer.

The undersigned is aware that CPNI compliance policies and procedures are required by law and have very serious repercussions for The Company, its customers and the public in general. The undersigned accepts appointment as the Company's Compliance Officer as of the Effective Date set forth below.

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CPNI Compliance Officer (Print)

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Signature

---

Date

XV. List of Recordkeeping Items-Timeframes are all MINIMUMS

**List of Recordkeeping Items – Timeframes are all MINIMUMS**

- Notice to Customers<sup>1</sup> – 1 Year
- Opt-Out<sup>2</sup> - 1 Year:
  - Keep initial Opt-Out letter – Indefinitely
  - Most recent 2-year reminder – Update every two years
- Opt-In<sup>2</sup> – 1 Year:
  - Keep initial Opt-In letter – Indefinitely
  - Keep responses you receive from customers – Indefinitely
- One-Time Use<sup>2</sup> – 1 Year:
  - Document the date of when one-time use was granted
- System to determine Customer’s CPNI status – Keep current
- Maintain your own and affiliates marketing campaigns<sup>3</sup> – 1 Year
  - Marketing Campaign Specifics:
    - Description of Campaign
    - Describe the specific CPNI that was used
    - List what products/services were offered
  - All instances where CPNI was disclosed or provided to 3<sup>rd</sup> parties
- Supervisory review process<sup>4</sup> – 1 Year
  - Supervisor must approve and review any proposed out-bound marketing request
    - Specifically, sales personnel must obtain approval of any proposed outbound marketing request for customer approval.

Burden on Carrier to prove they received customer approval
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<sup>1</sup> 64.2008(a)(2) A telecommunications carrier must maintain records of notification, whether oral, written or electronic, for at least one year.

<sup>2</sup> 64.2007(a)(3) A telecommunications carrier must maintain records of approval, whether oral, written or electronic, for at least one year.

<sup>3</sup> 64.2009(c) ...Carriers shall retain the record for a minimum of one year.

<sup>4</sup> 64.2009(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year.

- Customer Complaints regarding unauthorized release of CPNI<sup>5</sup> – 1 Year
- Actions taken against data brokers<sup>5</sup> – 1 Year
- Maintain a record of any breaches discovered and notifications to law enforcement and customers<sup>6</sup> – 2 Years
  - Record must include:
    - Dates of discovery
    - Dates of notifications
    - Detailed description of CPNI that was subject to the breach
    - Circumstances of the breach
- Training – 2 years
- Compliance Certificate & Accompanying Certificate - Lifetime

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<sup>5</sup> 64.2009(e) ...In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.

<sup>6</sup> 64.2011(d) ...Carriers shall retain the record for a minimum of 2 years.