**Attachment A**

**GNOC CPNI Compliance Procedures**

This statement describes Georgia Network Operations Company, LLC’s (“GNOC”) procedures for protecting the confidentiality of its customers’ Customer Proprietary Network Information (“CPNI”).

GNOC provides custom, high-capacity network services to enterprise, government,

carrier, and data center customers. GNOC’s customer contracts uniformly contain confidentiality agreements that address customers’ private information. It is the Company’s policy not to disclose CPNI except as specifically set out in its contracts with customers and where required by applicable law.

GNOC takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based upon customer-initiated contacts.

GNOC has an express disciplinary process in place for violation of its CPNI practices and procedures. GNOC employees are required to review and abide by GNOC’s Code of Conduct, which prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

GNOC uses CPNI for the following purposes:

(1) To initiate, render, maintain, repair, bill and collect for services;

(2) To protect the Company’s property rights; or to protect subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;

(3) For network maintenance; and

(4) As required by applicable law.

GNOC occasionally uses CPNI and other information to formulate recommendations concerning other or additional services of the same nature that customers already purchase from GNOC. With this exception, GNOC does not use CPNI for any marketing purposes. GNOC does not share, sell, lease or otherwise disclose or provide CPNI to any of its affiliates, suppliers, vendors or any other third party for the purpose of marketing any service.

GNOC’s Company’s policy is not to share, sell, lease or otherwise provide CPNI to third parties. GNOC will disclose CPNI to a third party only when required by a lawfully issued government subpoena or pursuant to an appropriate non-disclosure agreement for corporate or financial transactions.

GNOC does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers’ CPNI.

GNOC has established a supervisory review process designed to ensure compliance with the FCC’s CPNI rules.

GNOC has measures in place to discover and protect against attempts to gain unauthorized access to CPNI. GNOC commercially reasonable processes that do not include the use of account information or readily available biographical information to authenticate customer representatives that contact GNOC to request access to CPNI.

GNOC has in place procedures to detect breaches and to notify law enforcement and customers, in compliance with the Commission's rules, should a breach occur. In the event of a breach, GNOC will notify the Secret Service, FBI and its customers in compliance with the FCC’s rules and maintain a record of such breach and notifications.