

Customer Proprietary Network Information Procedures

Effective 1/01/06

Every telecommunications carrier has a duty to protect the confidentiality of proprietary information of, and relating to, other telecommunication carriers, equipment manufacturers, and customers, including telecommunication carriers reselling telecommunications services provided by a telecommunications carrier.

Process –

1. All disclosures or uses of Customer Proprietary Network Information (CPNI) are to be approved by the customer except for valid law enforcement requests. Lacking customer approval any request to utilize CPNI requires approval of the President or Vice-President to determine validity.
2. All disclosures of CPNI for law enforcement and marketing campaigns will be listed in the CPNI notebook along with backup documentations maintained by the President or Vice-President. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
3. The President or Vice-President will utilize lists of customers for which maintains the opt-in or opt-out approvals including history of notices to customers. All outbound marketing request campaigns need to be approved by the Vice-President or Assistant Vice-President.
4. In instances of Opt-out mechanisms that do not work properly the President or Vice-President are required to notify the FCC within five business days in writing. The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information. Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.
5. On or about the first of each year all personnel with customer data access will review the CPNI requirements covered in the FCC Small Entity Compliance Guide.
6. Annually the President or Vice-President will certify personal knowledge that the company had been in compliance with the above operating procedures and that those procedures are adequate to ensure we are in compliance with Federal laws and requirements.