

STATEMENT EXPLAINING HOW NU-TEL'S OPERATING PROCEDURES ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES

Annual Certification Processes Summary Certification for 2019 Covering Prior Calendar Year 2018

The Statements listed below describe and summarize Nu-TEL's procedures and actions that ensure compliance with the FCC's CPNI Regulations and Rules:

Employee CPNI Training

- Trained Nu-Tel's employees when they are *not* authorized to use CPNI.
- The company has informed its employees that compliance with the Communication Act and FCC Rules are extremely important, and has instituted a disciplinary procedure with regard to any violation of these CPNI requirements by employees that may lead to strict disciplinary actions including but not limited to; Unfavorable reviews, suspensions, remedial training and potential termination all dependent upon the circumstances surrounding a violation.

Opt-In/Opt-Out Processes

- Nu-TEL does *not* utilize 3rd Party Marketing Companies for any marketing campaigns directed to our VoIP Customers and therefore, an Opt-In mechanism is not utilized or required.
- When applicable, Nu-TEL uses an Opt-Out mechanism when communicating with our customers. As per CPNI regulations, Nu-TEL notifies our customers every (2) years of the customers' Opt-Out rights and methods. In the year 2018, there were no marketing campaigns requiring Opt-Out notifications.

Opt-Out Mechanism Failure

- Nu-TEL has established internal procedures whereby the company will provide the FCC with written notice within five (5) business days of any instance where an opt-out mechanism failed to work as intended.

Marketing Approval for Direct Campaigns

- Any proposed marketing campaign directed to Nu-TEL's VoIP Customers has to be approved by management prior to release. Management carefully checks collateral materials and approves language relating to Opt-Out options for its customers.

Action Taken Against Data Brokers (Pretexters)

- No known violations with regard to Pretexters have occurred within the period of 2017 that would necessitate any action.

Attempts to Access CPNI Information from Pretexters

- In the period of 2017, there were no known breaches of any attempt by Pretexters to access CPNI.

Other CPNI Compliance Measures

- Access to customers CPNI information is not an option for Nu-TEL's customers via a customer portal, or any other on-line method. Internal access to customers CPNI is limited to authorized personnel via restrictive passcodes issued and maintained by Ralph Meyers to ensure safeguards.

Customer CPNI Complaints – Unauthorized Release of CPNI

- In the period of 2018, there were no customer complaints regarding unauthorized release of CPNI.

Record-Keeping

- Nu-TEL has established procedures to control, document, and file all marketing campaigns that utilize customers' CPNI. In the year 2018, Nu-TEL did not execute any marketing campaigns directed to our VoIP Customers, nor to any other 3rd party.
- As part of Nu-TEL's record keeping policy, all marketing campaign records will be maintained for a minimum of one (1) year.

Customer Notification of CPNI Changes

- Nu-TEL has established procedures to notify its customers of any CPNI changes.