

Exhibit A

BalsamWest FiberNET, LLC CPNI Compliance Statement

Pursuant to 47 CFR §64.2009(e), this statement summarizes BalsamWest FiberNET, LLC's ("BalsamWest" or "Company") policy, practices and procedures to ensure compliance with 47 CFR Subpart U ("FCC CPNI Rules").

BalsamWest provides telecommunications services to enterprises, including businesses, schools, hospitals and carrier customers, pursuant to contractual arrangement and with customer account personnel assigned to each customer for sales and support. If in the future BalsamWest elects to expand or change the type and manner in which its services are marketed or provided that will impact its operational practices and procedures, the Company is committed to follow the applicable rules set forth in the FCC CPNI Rules with regard to access, utilization and protection of CPNI.

BalsamWest Operational Practices and Procedures

BalsamWest maintains a compliance program to ensure that it complies with all applicable CPNI rules and regulations.

- General Policy. BalsamWest is committed to taking all reasonable measures to discover and protect against attempts to gain unauthorized access to its customer's CPNI. BalsamWest discloses CPNI only (i) as set out in its written contracts with customers (ii) where required by law in accordance with lawful U.S. process or (iii) pursuant to a customer-initiated written request made to a BalsamWest dedicated account representative for such customer or to an authorized BalsamWest employee or agent. In person requests require evidence of a valid government issued ID.
- BalsamWest uses CPNI to market service offerings that are within the same category of the service that is already provided to the customer or to market services formerly known as adjunct to basic services. For purposes of obtaining customer approval to market communications related service(s) outside the category of services to which the customer subscribes or to disclose or allow access to CPNI to BalsamWest or its affiliates and agents, BalsamWest has elected to use the "opt-out" approval method as allowed under the FCC rules. BalsamWest advises the customer of the right to opt-out as it pertains to BalsamWest's use, disclosure, or access to the customer CPNI. All BalsamWest services are subject to execution of a written service order by the customer, with associated contractual terms and conditions, including the customer's right to opt-out at the time of service initiation or anytime thereafter. BalsamWest maintains its CPNI Policy on the Company web site and the right to opt-opt out is available 365 days a year, 24 hours a day.
- Training and Education. BalsamWest trains its personnel as to when they are and are not authorized to use CPNI, including the disciplinary process for non-compliance with the Company CPNI policies and procedures. All employees, contractors and agents who might have access to CPNI must read the BalsamWest CPNI policies and procedures and sign an acknowledgement that they have read, understand and agree

to abide by BalsamWest's CPNI policy. Additionally, BalsamWest trains all new sales and operational support personnel and has periodic training updates with existing sales and operational support personnel to ensure they understand BalsamWest's CPNI Policy, Customer Service Request ("CSR") access policy and Letter of Authorization ("LOA") policy.

- BalsamWest has a disciplinary process to ensure that its personnel, contractors and agents comply with restrictions regarding the use and disclosure of and access to CPNI. Non-compliance with FCC CPNI Rules will result in verbal and written warnings and, if not corrected or if done in a malicious or willful way, will lead to termination of employment. Those individuals who have access to customer's CPNI have specific performance requirements related to use and protection of CPNI and are subject to supervisory review.
- Services are marketed and sold by BalsamWest sales account representatives, who are responsible for the delivery of proper notification to both customers and prospective customers as to their rights regarding access and use of CPNI.
- The Company provides written notification at least once every two years to existing customers of the right to opt-out.
- At the time of service initiation and contract execution or any subsequent notice from BalsamWest to the customer of its opt-out rights, the customer will have thirty days to notify BalsamWest of an election to notify the Company of its election to opt-out. If the customer does not make such notification, the customer will be deemed to have consented to BalsamWest use, disclosure, or access to the customer's CPNI as provided under the FCC rules.
- BalsamWest has established procedures to ensure its customers' CPNI is not disclosed to unauthorized parties. As a part of customer service implementation the customer is required to complete an "information form", providing authorized contact information that is stored in the account information maintained on file and as required in the online billing system: phone and email information for the customer sales contact, provisioning contact and billing contact, granting permission for contact either via phone or email.
- If a representative of a customer is not reflected in BalsamWest records as being an authorized representative or (if a password has been established) the representative does not provide a valid password, BalsamWest will release the call detail information only (1) by sending the call detail information to an address of record; (2) by calling the telephone number of record; or (3) by releasing the information in person if the customer representative presents a valid government photo ID matching the authorized representative as reflected in the customer's account information on file at BalsamWest.
- Requests for CPNI by law enforcement agencies are only granted if a subpoena or

court order is submitted by an authorized court or government agency, or if the customer provides written permission, which shall be directed to an officer of the Company, or its designee, for approval before such access is granted by Company employees or agents.

- All services provided by BalsamWest to its established customers are subject to a written contractual arrangement with BalsamWest, which includes notice of customer's rights with regard to opt-out rights for use of CPNI at the time of contract execution or anytime thereafter. Customer contracts and associated written election of the customer regarding use of CPNI are maintained in a central location in electronic and hard copy format by BalsamWest for the duration of the contract and at least one year following termination of such contract or service order.
- In the normal course of business BalsamWest, like other carriers, obtains CPNI, though CSRs from other telecommunications carriers. If BalsamWest is required to access a CSR prior to execution of a contract that includes permission for access to CPNI, the BalsamWest standard procedure is to obtain written customer permission in an LOA from the customer prior to the request for CSR access. These written records are maintained (in hard copy or protected electronic copy) in a central location for two years from the date of access to the CSRs.
- To the extent necessary and in limited circumstances BalsamWest informs the customer as to their rights regarding use of and access to customer CPNI and provides its customers with the ability, on an individual case basis, to opt-in to permit BalsamWest to access, use or disclose their CPNI for certain purposes. Records of such opt-in are in writing and remain in place until the customer revokes the opt-in, in writing.
- BalsamWest retains electronic and hard copy archives of all Sales and Marketing campaigns which utilize CPNI, whether done by BalsamWest or an affiliate. These records are retained for at least one year. The Company policy requires that all BalsamWest marketing, including outbound marketing, have approval of the Vice President of Sales & Marketing.
- BalsamWest understands the requirement for "opt-in" approval in the case of using CPNI with joint venture partners. The Company currently does not have joint venture partners or independent contractors engaged in joint marketing to its customers. Any and all joint venture and independent contractor engagements require authorization and approval of the CEO of BalsamWest and may not be executed by any other employee or representative of BalsamWest. If so approved by the CEO, such engagements will require prior execution of Confidentiality Agreements which pass through BalsamWest policies regarding approval and use of CPNI.
- The Company practice is to maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. BalsamWest operational procedures require that all requests for customer

CPNI be in writing, whether from an authorized customer employee, third party or law enforcement, and these requests are maintained in BalsamWest archives for at least one year.

- BalsamWest customers have the ability to enroll in the Company's online bill presentation and payment application. The billing application uses a password system that requires a customer profile be established by an authorized BalsamWest staff person for customers before access is granted. The customer authorized user is then notified of the user ID and required to select a unique password. The CDG password system enforces periodic password changes and prevention of password recycling. The password and backup authentication method is designed to prevent customers from using readily available biographical information in the passwords. Customer notification to the previous contact or address of record whenever online access or passwords is changed by means of an email. The notification is not sent to the new account information.
- All other account changes, including address of record, must be provided in writing from the authorized customer representative, as specified in the terms of the BalsamWest – Customer contract. The authorized BalsamWest staff person makes the changes and provides a written notification once the change has been made back to the customer's authorized representative.
- In the case of a breach which results in unauthorized CPNI disclosure, BalsamWest sends notification of such breach to the governmental agencies and to the customer as specified in the FCC CPNI Rules; that is, no later than seven days following the breach, to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) in accordance with 47 CFR §64.2011. BalsamWest internal procedure is to notify the customer following notice to law enforcement, unless there is an urgent need to notify the customer to prevent harm. BalsamWest retains electronic or manual records of all CPNI breaches for a minimum of two years.