



## STATEMENT OF CPNI PROCEDURES

Clay County Rural Telephone Cooperative, Inc. d/b/a Endeavor Communications (Endeavor), has established operating procedures that ensure compliance with the Federal Communications Commission (FCC) regulations concerning the protection of customer proprietary network information (CPNI).

- Endeavor provides training and a written manual for all of its employees with access to CPNI regarding the appropriate use of CPNI. All training of current Endeavor employees is conducted by Endeavor on a scheduled basis. All appropriate Endeavor employees completed CPNI training in May of 2017. The next training for all appropriate Endeavor employees will be in May of 2018.
- All trained employees have been notified of the FCC's regulations regarding CPNI and disciplinary procedures have been established should any employee violate CPNI regulations as stated in Endeavor's Manual.
- All new employees are shown a Power Point slideshow as their preliminary CPNI training by the VP of People Services (Elizabeth Cheatham) at the time of their new hire orientation.
- Endeavor maintains records of all marketing campaigns including a description of the medium used; details of CPNI, if any, used in the campaign; and what products and services were offered as part of the campaign. When Endeavor does targeted marketing of products, the proper steps are taken to remove the CPNI customers that have opted out. The Customer Engagement & Media Relations Coordinator (Kathy Morgan) approves all marketing materials in accordance with CPNI regulations.
- All new customers receive a document explaining the FCC requirements and CPNI regulations. We require each customer to create a CPNI password for his/her account. This document also gives our customers the opportunity to be excluded from receiving targeted marketing materials about products outside our existing business relationship with them.
- Biennially, Endeavor mails a CPNI Opt-Out Notice to all customers. This notice explains the CPNI process and gives customers the opportunity to opt-out of targeted marketing. Notices were mailed on March 27<sup>th</sup>, 2017. The next notice will be mailed to all Endeavor customers in March of 2019.
- Customers who have 'opted out' are noted as such on their accounts in our NISC billing software system. A field on their account is populated/marked and this field is easily reported from to ensure that marketing materials are sent in compliance with the FCC Opt Out procedures.
- All Endeavor customers must provide a CPNI password in order to receive detailed information about their account. If they are not able to provide the password, they are asked to answer two security questions (previously established by the account holder). If they are not able to give accurate answers, they are not given access to CPNI.
- In the event of a CPNI breach, the CPNI Compliance Officer is notified immediately and the breach will be filed appropriately.

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