**Ellijay Telephone Company - 499 Filer ID 808176**

**ETC Communications, LLC - 499 Filer ID 819246**

**P. O. Box O, Ellijay, GA 30540 (706) 276-2271**

**STATEMENT OF FCC CPNI RULE COMPLIANCE**

This statement serves to explain how Ellijay Telephone Company and ETC Communications, LLC (collectively “the Companies” or “Companies”) are complying with Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R §§ 64.2000-2009).

***As of this date, the Companies haves not used nor plans to use CPNI for marketing. For marketing purposes, the Companies uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.***

**1. Identification of CPNI**

The Companies have informed employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC’s rules at Section 64.2003(d) of the FCC’s Part 64, Subpart U CPNI rules.

**2. Customer Notification and Authorization Process**

Because the Companies have not or do not have plans at this time to use CPNI for marketing, the Companies have not implemented notice and approval procedures. However, the Company has established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC’s Part 64, Subpart U CPNI rules. In the event the companies undertakes to use CPNI for marketing and provides written notification, the Company’s notification will comply with the requirements of the Section 64.2007(f)(2).

**3. Disciplinary Process**

In compliance with Section 64.2009(b) of the FCC’s Part 64, Subpart U CPNI rules, the Companies have in place a disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC’s CPNI rules.

**4. Record Safeguards**

Before undertaking to use CPNI for marketing purposes, the Companies will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC’s Part 64, Subpart U CPNI rules.

**5. Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, the Companies will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC’s Part 64, Subpart U CPNI rules.