

Attachment A
CPNI Checklist

- ✓ Highland Communication Service has chosen to prohibit the use of CPNI for marketing purposes between itself and its affiliates, if any.
- ✓ Highland Communication Service' Policy Manual(s) has/have been updated to include CPNI.
- ✓ Employees have been trained on the FCC CPNI rules and Highland Communication Service' penalties for non-compliance and their signed acknowledgements have been obtained and filed.
- ✓ Employees who might need to access Customer Service Records (CSR) stored in the OSS of other carriers/service providers have been provided a copy of Highland Communication Service' CSR Policy, including penalties for non-compliance, and their signed acknowledgements have been obtained and filed. (CSR Policy requires written customer authorization prior to accessing CSR data as part of the new customer sales process).
- ✓ Highland Communication Service requires written approval for release of CPNI to third parties.
- ✓ Customer Notice and Authorization forms are readily available to Company employees / Compliance Officer for distribution to customers upon request.
- ✓ Highland Communication Service has chosen to use authorized CPNI for marketing.
- ✓ Highland Communication Service provides CPNI education material to customers annually.
- ✓ Highland Communication Service will require a password for any customer-initiated telephone contact where call detail information is being requested. If the password can not be provided the call detail information will be mailed to the address of record, or, by calling the customer at the telephone number of record.
- ✓ A Corporate Officer has been named as the Highland Communication Service CPNI Compliance Officer and will certify annually that Company is in compliance with all Federal CPNI rules and will make the required annual filing to the FCC.
- ✓ Safeguards are in place with all third parties having access to Highland Communication Service customer data or responsibility for creation of Highland Communication Service customer data. All applicable parties have attested to their compliance with FCC CPNI Rules and their attestations are on file.
- ✓ Safeguards are in place to obtain the explicit consent of a customer before disclosing a customer's CPNI to a joint venture partner or independent contractor for the purpose of marketing communications-related services to that customer.