

CPNI Compliance Statement and Operating Procedures of Charleston Telecom Solutions, LLC

Pursuant to the requirements contained in Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services, CC Docket No. 96- 115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Red 6927 (2007)("EPIC CPNI Order"), ¹ I, Robert Bascom, Owner of Charleston Telecom Solutions, LLC Inc makes the following statement:

Charleston Telecom Solutions, LLC has established policies and procedures to comply with the Federal Communications Commission's (FCC) rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that Company is compliant with the FCC's customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize our Company's policies and procedures designed to safeguard CPNI.

Charleston Telecom Solutions, LLC uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. Charleston Telecom Solutions, LLC does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

Charleston Telecom Solutions, LLC has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

Charleston Telecom Solutions, LLC has established procedures to verify an incoming caller's identity. Charleston Telecom Solutions, LLC trains its personnel as to when they are and are not authorized to use CPNI and has an express disciplinary process in place. Charleston Telecom Solutions, LLC also limits the number of employees that have access to customer information and call data.

Charleston Telecom Solutions, LLC shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

¹ 47 C.F.R. S: 64.2009(e) states: "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that Charleston Telecom Solutions, LLC has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."

Charleston Telecom Solutions, LLC has established a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

Charleston Telecom Solutions, LLC will provide written notice within five (5) business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

1. The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.
2. Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.

Should an authorized CPNI breach occur:

1. Charleston Telecom Solutions, LLC shall provide notification within seven (7) days to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI).
2. Charleston Telecom Solutions, LLC shall wait an additional seven (7) days from its government notice prior to notifying affected customers of the breach.
3. If Charleston Telecom Solutions, LLC determines that there is an immediate risk of irreparable harm to the customer, Charleston Telecom Solutions, LLC will not wait the additional seven (7) days to notify the customer.
4. Charleston Telecom Solutions, LLC shall maintain records of discovered breaches for a period of at least two (2) years.

Charleston Telecom Solutions, LLC has not taken any actions (proceedings instituted, or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

Charleston Telecom Solutions, LLC annually submits a CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.



02/12/2019

NAME

Owner

DATE

TITLE