

ATTACHMENT

Customer Proprietary Network Information (CPNI)

Documentation for: ATV Holdings LLC dba Mitchell Telecom

 1801 N Main St Ste 25

 Mitchell, SD 57301

Per the FCC CPNI rules, Mitchell Telecom certifies that we are in compliance with the CPNI rules and we have taken the following steps to protect CPNI:

- The company's CPNI manual to account for CPNI handling.
- A compliance officer is designated to oversee all CPNI training and activity.
- All employees have been trained on when they are, and are not, authorized to use or disclose CPNI.
 - Authentication steps are in place for handling customer requests in person and over the phone.
 - Passwords are established for customers requesting call detail records. If no password is present, Mitchell Telecom will use other approved methods of authentication before proceeding.
- Customers are notified in writing of account changes within 48 hours of a qualifying change.
- We use the opt-out method to request approval of CPNI use for marketing campaigns.
 - We notify customers bi-annually of their CPNI rights.
 - We notify new customers as a part of our customer sign-up process. Their opt-out notification is included in our terms & conditions reviewed at sign-up.
 - Customer records within our billing system display their opting status for their account.
 - The company's compliance officer retains CPNI notification and opting records for two years.
- Maintain record of any marketing campaigns that use customers' CPNI. These records are maintained for a minimum of one year.
- An outbound marketing supervisory review process has been established.
- Defined disciplinary process in place for violations and/or breaches of any customer records containing CPNI.
- Proper authorities will be notified of any CPNI breaches.

CPNI Breaches and Customer Complaints for 2018

- Number of CPNI breaches for 2018 – none.
- Number of CPNI customer complaints for 2018 – none.
- Actions taken against data brokers in 2018 – none.

We are unaware of current processes pretexters are utilizing for attempted CPNI access. At this time, we have not encountered known pretexting.