

WCTA STATEMENT OF COMPLIANCE

The operating procedures of West Central Telephone Association (WCTA) ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

Our company makes limited, one-time use of CPNI to market our communication-related services only in compliance with FCC Rule 64.2008.

Before (but proximate to) soliciting customer consent for the use of CPNI to market our (or our affiliates') communication-related services, we give each customer notice of his or her right to restrict use and disclosure of, and access to, his or her CPNI, in compliance with FCC Rule 64.2008. Our company maintains a record of these notifications for at least one year.

Our company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Each customer's record contains a designation identifying whether or not we have obtained, through the processes permitted by the FCC's rules, the customer's approval to use, disclose or permit access to his or her CPNI.

Our company accesses and uses a customer's CPNI to market our own or our affiliates' communication-related services (outside a customer's current relationship) only after the customer's Opt-Out consent has been obtained in compliance with FCC Rule 64.2008, and which consent has not been revoked by the customer. Every two years our company (a) provides notice of customers' rights to restrict use and disclosure of, and access to, their CPNI, in compliance with FCC Rule 64.2008, and (b) solicits Opt Out consent for the use of the customer CPNI, in compliance with FCC Rule 64.2008, to each customer who has given Opt Out consent.

Our company does not permit any third parties (non-affiliate) to access or use our customers' CPNI.

Our company has a supervisory review process regarding our compliance with the FCC's CPNI rules for any outbound marketing efforts. We require sales personnel to obtain supervisory approval of any proposed outbound marketing request for customer approval.

CPNI Safeguards

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our company has established password protection for customers' online accounts.

Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.

CPNI Recordkeeping and Reporting

Our company maintains records of our compliance with the FCC's CPNI Rules for use of CPNI in outbound marketing efforts, for at least one year.

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.