

Annual 47 C.F.R. § 64.2010(e) CPNI Certification
EB Docket 06-36

Attachment 1: Statement Concerning Company Procedures

Summit Telecom, LLC (“Company”) has established strict policies and procedures, which expressly prohibit release of Customer Proprietary Network Information (“CPNI”) to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Employees that may have access to CPNI receive an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a “need to know” for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require approval of the officer responsible for ensuring that each campaign strictly complies with the Commission’s CPNI regulations.

In calendar year 2017, the Company took no action against data brokers. In calendar year 2017, the Company received no consumer complaints regarding CPNI issues.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.