



## Statement of Explanation: CPNI Compliance

The operating procedures of Perry-Spencer Rural Telephone Cooperative, Inc. (d/b/a PSC) and of Perry-Spencer Communications (d/b/a PSC) are designed to ensure compliance with the CPNI rules applicable to them (including the new CPNI rules effective December 8, 2007). Such compliance procedures are as follows:

- PSC has designated a CPNI Compliance Officer for the company. PSC maintains CPNI files, including the tracking of all customer complaints for one year, tracking of CPNI breaches for two years, and tracks all Opt-Out customers.
- Customer's CPNI Opt-out status is clearly shown on the customers' accounts and is verified prior to the use of CPNI.
- PSC (Compliance Officer) trains and certifies all company employees with access to CPNI regarding CPNI requirements as to when they are and are not authorized to use CPNI. PSC has established express disciplinary procedures for employee violations of CPNI rules whether intentional or unintentional.
- The Compliance Officer reviews and approves all marketing and sales campaigns prior to mailing. And, stores copies in the CPNI file for a minimum period of one year.
- PSC will file an annual certification and statement of CPNI compliance by March 1<sup>st</sup> each year.
- PSC only shares call detail records (CDR's) by mailing the CDR to the customers' address of record (of at least 30 days) or in person after confirming the customer's identity with a valid, government-issued ID. PSC authenticates all customers to discuss any non-CDR details on their accounts.
- PSC uses an Opt-Out approach to target market products and services outside the existing customer relationship. PSC sends opt-out notices to all customers every two years. PSC also sends opt-out notices to all new customers. PSC has a process in place to notify customers of account changes (address changes, etc.). PSC mails a generic letter to those customers within 48 hours after a change has been made to their account.
- PSC will notify law enforcement (the FBI and the United States Secret Service) within seven business days after a breach occurs. After the seven days waiting period for law enforcement notification, PSC will notify the customer of any CPNI breach.
- PSC will take measures to discover and protect against pretexting and unauthorized disclosures of CPNI. PSC recognizes they have a 'general duty' to protect CPNI and will take measures to protect their customers' CPNI.

PSC

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