

Attachment A
Statement Concerning Procedures Ensuring Compliance with CPNI Rules

The operating procedures of Citizens Telephone Cooperative, Inc. Filer ID 801393 ensure that the Cooperative complies with Part 64, section 2001 *et.seq.* of the FCC rules governing the use of CPNI.

The Cooperative has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Cooperative relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Cooperative trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Cooperative has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Cooperative's CPNI Operating Procedures.

The Cooperative maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Cooperative has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Cooperative maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

The Cooperative requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Cooperative maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.