



## STATEMENT OF COMPLIANCE PROCEDURES

Set forth below is a statement summarizing the policies and procedures of Locus Telecommunications, LLC ("Locus" or "the Company") that ensure Locus is in compliance with the Federal Communications Commission's ("FCC") CPNI regulations, as applicable. *See* 47 C.F.R. §64.2001 *et seq.* Locus is an established, leading provider of prepaid wireless, point-of-sale

As a provider of prepaid of wireless calling services, which are offered predominantly to a transient public at retail outlets and kiosks, Locus is generally not privy to customer information such as name, address and other personal information because such information is not gathered at the point-of-sale.

To the extent Locus maintains Call Detail Records ("CDRs"), CDR data is not associated with individual customer account information, but rather is associated with unique MDN (mobile device number). All hard copy CDR data is maintained in a secure location, and electronic CDRs are housed in password-protected files. Locus does collect customer information, including billing and call data through its Interactive Voice Response ("IVR"), e-commerce and customer service sales. Locus does not retain credit Card Verification Values ("CVVs") and stores the remaining information in a password-encrypted network that only specific Locus personnel with a need for the information can access.

Locus ensures that its business methods and operating procedures are in compliance with the FCC's CPNI Rules. Locus has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI. All employees must sign the Company CPNI policy upon hiring. Locus also trains its employees regarding the appropriate use of CPNI and has instituted disciplinary procedures should an employee violate the Company's policies.

Locus ensures that no data or information, CPNI or otherwise, regarding our customers is ever sold to or provided to any third parties for any purpose, unless pursuant to lawful subpoena. Moreover, any call detail information obtained by Locus is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes. In the event of unauthorized CPNI access, Locus will notify the requisite law enforcement agencies, and the customer when possible.

Locus did not use CPNI in any marketing campaigns during 2018.

Locus' internal network and onsite and offsite data are maintained securely through technology and other methods. All customer information is therefore protected from "hacking" and other forms of misappropriation.

Locus has not taken any actions (proceedings instituted or petitions filed with state commissions, through the court system, or at the Commission) against data brokers in the past year and has not received any customer complaints in the past year concerning the unauthorized use of CPNI. The Company has no information, other than publicly reported information regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

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