


CERTIFICATION

I, Sharon Lundgren, hereby certify as President of Volcano Telephone Company that I have personal knowledge that this company has established operating procedures effective during the calendar year 2017 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2011.

  
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Name: Sharon Lundgren  
Title: President  
Date: 2/26/18

## STATEMENT

Volcano Telephone Company (“Volcano”) has established operating procedures that ensure compliance with the Federal Communication Commission (“Commission”) regulations regarding the protection of customer proprietary network information (“CPNI”).

- Volcano has implemented a system whereby the status of a customer’s CPNI approval can be determined prior to the use of CPNI.
- Volcano continually educates and trains its employees regarding the appropriate use of CPNI. Volcano has established disciplinary procedures should an employee violate the CPNI procedures established by Volcano.
- Volcano maintains a record of its and its affiliates’ sales and marketing campaigns that use its customers’ CPNI. Volcano also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Volcano has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of its compliance for a minimum period of one year. Specifically, Volcano’s sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Volcano took the following actions against data brokers in 2017, including proceedings instituted or petitions filed by Volcano at a state commission, in the court system, or at the Federal Communications Commission: there were no data broker incidents in 2017
- The following is information Volcano has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: Volcano used a variety of methods to authenticate customers prior to disclosing CPNI and established passwords for use when discussing Call Detail Records with the customer of record. Volcano does not use CPNI for marketing purposes.

- The following is a summary of all customer complaints received in 2017 regarding the unauthorized release of CPNI:
  - Number of customer complaints Volcano received in 2017 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: none
  - Category of complaint:
    - \_\_\_\_\_ Number of instances of improper access by employees
    - \_\_\_\_\_ Number of instances of improper disclosure to individuals not authorized to receive the information
    - \_\_\_\_\_ Number of instances of improper access to online information by individuals not authorized to view the information
    - \_\_\_\_\_ Number of other instances of improper access or disclosure
  - Description of instances of improper access or disclosure: