

Attachment A

Statement of CPNI Procedures and Compliance

Attachment A
Spread Telecommunications, LLC
Statement of CPNI Procedures and Compliance

USE OF CPNI

Spread Telecommunications, LLC ("Spread Telecom") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Spread Telecom trains its personnel not to use CPNI for marketing purposes. Should Spread Telecom elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 C.F.R. Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

PROTECTION OF CPNI

Spread Telecom has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Requests for information must be sent in writing by the authorized party of record for the customer. Spread Telecom responds in writing, to the authorized customer representative at the primary address of record. Electronic mail communications are allowed as written communications.

Spread Telecom maintains a record of all instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to CPNI.

DISCLOSURE OF CPNI OVER THE TELEPHONE

Spread Telecom does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry. If it elects to do so in the future, it will follow the applicable rules set forth in 47 C.F.R. Subpart U for the release of call details.

DISCLOSURE OF CPNI ONLINE

Spread Telecom does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 C.F.R. Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

DISCLOSURE OF CPNI AT RETAIL LOCATIONS

Spread Telecom does not have any retail locations and therefore does not disclose CPNI in-store.

NOTIFICATION OF ACCOUNT CHANGES

Spread Telecom has put into place procedures to notify customers of account changes whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information. All changes of account information will result in notification of the authorized party of record for the customer, and a confirmation from the authorized party of record will be required before the changes are implemented.

NOTIFICATION TO LAW ENFORCEMENT

Spread Telecom has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. Specifically, as soon as practicable, and in no case later than seven business days upon learning of a breach, the company will notify the U.S. Secret Service and the FBI by electronic means, as required by FCC regulations. The Company will not notify customers or disclose a breach to the public until seven full business days have passed after notification to the U.S. Secret Service and the FBI, unless it believes there is an extraordinarily urgent need to notify customers before seven days in order to avoid immediate and irreparable harm. In that instance, it will only notify such customers *after* consultation with the relevant investigating agency and will cooperate with the agency's request to minimize any adverse effects of the customer notification. If the Company receives no response from law enforcement after the seventh full business day, it will promptly proceed to inform the customers whose CPNI has been disclosed of the breach. The Company will delay notification to customers or the public if requested to do so by the U.S. Secret Service or FBI. Notifications to law enforcement and customers are handled by a designated supervisor level employee responsible for managing the company's CPNI compliance.

ACTIONS TAKEN AGAINST DATA BROKERS

Spread Telecom has not taken any actions against data brokers in the past year.

CUSTOMER COMPLAINTS ABOUT CPNI BREACHES

Spread Telecom did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2017.

INFORMATION ABOUT PRETEXTERS

Spread Telecom has not developed any information with respect to the processes pretexters are using to attempt to access CPNI, but does take steps to protect CPNI by adhering to the guidelines described herein for access to CPNI. Spread Telecom is committed to notify the FCC of any new or novel methods of pretexting that it encounters and of any actions Spread Telecom takes against pretexters and data brokers.