

Answer Fort Smith, Inc.

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CPNI Certification

STATEMENT

Answer Fort Smith, Inc. ("Carrier") has established operating procedures that insure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information. ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains record of its and its affiliates sales and marketing campaigns that use its customers CPNI. Carrier also maintains a record of and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier took the following actions against data brokers in 2008 and to the present, including proceedings instituted or petitions filed by Carrier at a state commission, or the court system, or at the Federal Communications Commission. None
- The following is information Carrier 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:
Carrier has determined that no pretexter has attempted to access CPNI on Carrier's system.
- The following is a summary of all customer complaints received in 2008 and to the present regarding the unauthorized release of CPNI:

Number of customer complaints Carrier received in 2008 and to the present related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: None

Category of complaint:

- 0 Number of instances of improper access by employees
- 0 Number of instances of improper disclosure to individuals not authorized to receive the information
- 0 Number of instances of improper access to online information by individuals not authorized to view the information
- 0 Number of other instances of improper access or disclosure

Description of instances of improper access or disclosure: None