

**Accompanying Statement Explaining
Celtic Communications, LLC'S CPNI Procedures
(Annual 47 C.F.R. Section 64.2009E Certification Filing)**

For YEAR 2018 –

Policy:

As an interconnected VoIP provider, Celtic Communications, LLC protects the confidentiality of Customer Proprietary Network Information ("CPNI") in accordance with FCC rules and the law.

Celtic Communications has established a Privacy Policy which is in compliance with Title 47 of the United States Code, Section 222 and consistent with the CPNI rules found at 47 C.F.R. Section 64.2001. Specifically Celtic Communications complies with Title 47 of the United States Code, Section 222 which states in part:

(1) PRIVACY REQUIREMENTS FOR TELECOMMUNICATIONS CARRIERS

Except as required by law or with the approval of the customer, a telecommunications carrier that receives or obtains customer proprietary network information by virtue of its provision of a telecommunications service shall only use, disclose, or permit access to individually identifiable customer proprietary network information in its provision of (A) the telecommunications service from which such information is derived, or (B) services necessary to, or used in, the provision of such telecommunications service, including the publishing of directories.

(2) DISCLOSURE ON REQUEST BY CUSTOMERS

A telecommunications carrier shall disclose customer proprietary network information, upon affirmative written request by the customer, to any person designated by the customer.

(3) AGGREGATE CUSTOMER INFORMATION

A telecommunications carrier that receives or obtains customer proprietary network information by virtue of its provision of a telecommunications service may use, disclose, or permit access to aggregate customer information other than for the purposes described in paragraph (1). A local exchange carrier may use, disclose, or permit access to aggregate customer information other than for purposes described in paragraph (1) only if it provides such aggregate information to other carriers or persons on reasonable and nondiscriminatory terms and conditions upon reasonable request therefor. The term "aggregate customer information" means collective data that relates to a group or category of services or customers, from which individual customer identities and characteristics have been removed.

Procedures:

To protect CPNI, Celtic Communications provides its customers with access to the Privacy Policy as it is referenced within the proposal/contract provided to the potential customer and is posted on Celtic Communications' website. The Privacy Policy is incorporated into the contract customers execute in order to obtain the services. Upon execution of a contract for services and the provisioning of those services, Celtic Communications issues an automatic Welcome letter to each customer. The Welcome



letter provides the customer with a unique and confidential PIN which can be changed as often as the customer chooses. The customer is to provide the PIN to Celtic Communications for validation when the customer contacts Celtic regarding its account including, but not limited to, when requesting services or information. The Welcome letter is automatically generated by the portal used to deliver the services and it reads as follows:

*Dear <CompanyName>,
Welcome to the Celtic Communications network! Your new account is setup and we will be contacting you shortly about the next steps in getting your new PBX system up and running.*

We have created a PIN for your PBX that you and your employees should have ready when contacting our support or billing staff for any reason. This PIN will be used to authenticate you to our staff before our staff will provide any customer information via the phone.

Your new PIN is <CpniPin>

*Welcome again!
Celtic Communications Support
Tel 561 300 1000
Fax 561 300 1100*

In the event the customer is unable to provide the PIN, a second method of authentication is available. The customer provides his/her name and extension number which much appear in the system for that customer. Celtic Communications then calls the person at the number and extension provided to verify identity. Prior to providing information or services to a customer, Celtic staff are required to confirm the identity and authority of the requestor first by requesting the PIN and second, if the PIN is not provided, by verifying the identity of the caller with a return call as described above.

Prior to the issuance of this PIN, the communications between Celtic Communications and a customer regarding potential services are limited to Celtic's President, Director of Account Management, or Chief Operating Officer and the potential customer's authorized individual who initiates the request for information and/or a proposal for services.

Training. Celtic's staff is directed to comply with Celtic's Privacy Policy. Staff is trained on what constitutes CPNI and directed not to use or disclose that information except as permitted under the policy. The training includes a review of the Privacy Policy as well as a discussion regarding what constitutes CPNI with examples. The staff is trained to only accept requests for customer information or services that require the disclosure of CPNI from those individuals authorized by the customer as evidenced by the customer's provision of its PIN (or who meet the secondary method of authentication). Any violation is to be brought to the immediate attention of the President who will review the situation and determine the appropriate response. Failure to comply with Celtic's Privacy Policy is considered a serious offense subject to disciplinary action and possible termination of



employment. Celtic employees are required to review the policy and sign a document attesting to their review and understanding of the information provided. In addition, a training session to review the Privacy Policy material is conducted yearly or upon material changes, whichever occurs first. New employees will be provided training on the Privacy Policy as part of their onboard training and introduction to Celtic Communications.

A significant portion of CPNI is stored in the portal from which the services are configured, activated, and changed. The portal also stores the customer's account and billing information. This portal and the information contained therein are safeguarded by limiting access to only those individuals who are granted access by Celtic Communications. These individuals must use a unique password to log in to the portal. In addition, after a set time of inactivity, the individual accessing the portal is required to log back in using their password.

Celtic Communications does not use its customers' CPNI information for sales and marketing campaigns nor does it sell any CPNI information. In the event this should change, Celtic Communications will maintain a record of all instances where the CPNI was disclosed or provided to third parties or where third parties were allowed access to CPNI. Electronic copies of all such records will be maintained for at least one year.

Celtic Communications does not work directly with any data brokers and does not sell any customer information to any third parties. In the event this should change, Celtic Communications will take action against any data broker acting in violation of its policy.

Celtic Communications intends to maintain a list of all customer complaints concerning unauthorized release of CPNI along with the actions taken to address the complaints. To date, there have been no such complaints. Since complaints may be transmitted in a number of formats including email, voicemail, letters, and direct conversations, the staff at Celtic is required to direct any customer complaints directly to the President and alternatively, to the Director of Account Management, or Chief Operating Officer in the format received if possible. A Customer Complaint Form is to be filled out for each complaint and any supporting documentation attached. The President will determine the appropriate response. The President directs the Chief Operating Officer to maintain the Customer Complaint Forms and accompanying documentation, all of which is maintained on a secure server with only key personnel who have access.

Celtic Communications does not provide any CPNI to partners, vendors, or other entities other than (1) as required to fulfill its contractual obligations; (2) as specifically directed in writing to do so by its customer; or (3) in accordance with the exceptions permitted under Title 47 of the United States Code, Section 222 (d).

Should additional information be required, please contact Deborah Branham at 561-300-1000.