

STATEMENT OF RICHMOND POWER AND LIGHT CONCERNING ITS CUSTOMER PROPRIETARY NETWORK INFORMATION RULES AND POLICIES

The following rules and policies describe Richmond Power and Light's ("RPL") operating procedures for maintaining a comprehensive customer proprietary network information ("CPNI") program to protect the privacy of our customers pursuant to Section 222 of the Communications Act of 1934, as amended, 47 U.S.C. § 222, and the FCC's rule 47 C.F.R. § 64.2001 et seq. These procedures prohibit the sale of telephone call records or the marketing use of such information. The use of customer data for external or internal sales initiatives is prohibited and a disciplinary process is in place to handle any violation of this policy.

It is the policy of RPL not to use, disclose, or permit access to Customer Proprietary Network Information ("CPNI"), as defined in the FCC's rules, for any purposes other than the following, all of which are permitted without customer approval under FCC rules:

- a. For the purpose of providing or marketing Company service offerings among categories of service (i.e., local, interexchange) to which the customer already subscribes.
- b. For the purpose of providing inside wiring installation, maintenance, and repair services.
- c. For the purpose of marketing "adjunct-to-basic" services, such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features.
- d. For the purpose of protecting the rights or property of the Company, or to protect users of its services and other carriers from fraud, abusive, or unlawful use of or subscription to such services.

I. SCOPE

A. Prohibition on Use of CPNI in Marketing

To ensure the protection of the privacy of customer information by prohibiting the unauthorized release of CPNI and to prohibit the external or internal sale of telephone call records. Under no circumstances shall the customer databases associated with RPL's telephone system be utilized for marketing activities.

If at some point in the future RPL changes its policies with regard to the use of CPNI for sales or marketing purposes it shall comply in all respects with the Commission's rules, including regulations relating to customer rights to opt in or opt out of such campaigns.

B. Policies With Respect to Customer Access (protections against pretexting)

- RPL shall not release CPNI to customers during customer-initiated telephone contact except when the customer provides a password.
 - a) If a customer does not provide a password, RPL may release call detail information by sending it to an address of record or,
 - b) by calling the customer at the telephone of record.
- RPL shall provide mandatory password protection for online account access.
- RPL may provide CPNI to customers based on in-store contact with a valid photo ID.

- RPL shall notify the customer immediately when 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.

II. COMPLIANCE OFFICER

Rich Cody has been appointed as the CPNI Compliance Officer, and can be reached at (765) 973-7247. All requests for CPNI data shall be referred to the CPNI Compliance Officer.

III. PROCEDURES

Upon receipt of a third-party request for customer call records or other CPNI data that is not initiated by the customer with verified password information:

- The employee receiving the request shall notify the Compliance Officer.
- The Compliance Officer shall log the request with approved/denied status.
- Only requests associated with a legal court order shall be approved/released. An accompanying letter must indicate that released information will not be used for marketing activities.
- Failure to follow the above procedure shall result in disciplinary action.

IV. REQUIREMENTS UPON DISCOVERY OF UNAUTHORIZED DISCLOSURE

In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC rules, the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through <http://www.fcc.gov/eb/cpni>, and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule section. The Company will maintain a record of any such breaches and notifications for at least two (2) years.

V. TRAINING

All Customer Service, Sales, and Marketing employees shall receive CPNI training on annual basis.

VI. RECORD KEEPING

A written record of all requests for, and complaints regarding, CPNI shall be maintained for a minimum of one year. An Officer of RPL shall provide a compliance certificate to the FCC by March 1 of each year documenting compliancy with this program and records of requests or complaints, as well as information with respect to proceedings against data brokers and pretexters.

RPL has not detected any unauthorized access to CPNI, either by employees, pretexters or other third parties. RPL did not receive any customer complaints regarding CPNI in 2017.

RPL does not currently allow CPNI for sales or marketing. If at some point RPL changes its policies it shall retain a record of its all such sales and marketing campaigns that use its customers' CPNI. The record will include 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.

The above rules and procedures are in place to fully protect CPNI in accordance with FCC regulations.

Annual 47 C.F.R. § 64.2009(e)

CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior year 2017.

1. Date filed: February 23, 2018
2. Name of company(s) covered by this certification: City of Richmond, Richmond Power & Light
3. Form 499 Filer ID: 829178
4. Name of signatory: Randy Baker
5. Title of signatory: General Manager
6. Certification:

I, Randy Baker, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 
Randy Baker