**McClure Park LLC**

**STATEMENT OF CPNI OPERATING PROCEDURES EFFECTIVE JULY 1, 2014**

McClure Park LLC ("McClure") has established policies and procedures to comply with regulations regarding the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in 47 C.F.R. § 64.2001 *et seq*. This statement is a summary of McClure’s policies.

1. McClure may use, disclose and/or permit access to CPNI:
   1. for the establishment of the telecommunications services from which such information is derived;
   2. for the following limited purposes:
      1. to initiate, render, bill, and collect for telecommunications services;
      2. to protect the rights or property of McClure, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
      3. to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if such call was initiated by the customer and the customer approves the use of such information to provide such services; and,
   3. where required by law in accordance with lawful U.S. process.

1. McClure does not use CPNI to conduct outbound marketing or in connection with its sales and marketing campaigns. McClure also does not disclose or permit access to CPNI to affiliates or third parties for marketing purposes.

1. McClure trains its personnel who deal with CPNI regarding these procedures, including when personnel are and are not permitted to use CPNI. McClure has established disciplinary procedures for violations of these policies and procedures by personnel.

1. McClure has implemented procedures to authenticate its customers and has elected not to disclose CPNI over the phone and does not allow for online access to CPNI.
2. McClure has instituted measures to discover and protect against unauthorized attempts to access CPNI. Among other measures, McClure has implemented internal security procedures and other network security protocols.

1. McClure has implemented policies pursuant to which it will track any breaches of CPNI, and will notify the appropriate authorities and the affected customers (as permitted) upon discovery of a CPNI security breach. McClure will maintain a record of such information for a two-year period.

1. McClure will track customer complaints regarding CPNI.

1. McClure will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that McClure has established to safeguard CPNI, which will include information regarding actions against data brokers and a summary of all customer complaints regarding the unauthorized use of CPNI.