

Vesta Solutions, Inc., CPNI Compliance Statement

This statement accompanies the Vesta Solutions, Inc. (Company") 2018 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. See 47 C.F.R. § 64.2001et seq.

- Company has in place privacy policies for the protection of confidential/sensitive information, which include policies and procedures Company has implemented to safeguard all customer confidential and sensitive information including CPNI. Company employees are made aware of the disciplinary actions they would face in the event of violation of said policies and procedures.
- As of this date, the Company does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Should the Company elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in the FCC's CPNI rules, 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.
- Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out process. Company does not provide CPNI to other parties and thus has not used the opt-in approval process. Prior to initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.
- At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).
- The Company does not disclose CPNI to any agents, affiliates, joint venture partners or independent contractors, nor does it use CPNI to identify or track customers who call competing providers.
- Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's rules.

Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

- Not applicable. No actions taken against data-brokers.
- No customer complaints received.