

BEE LINE, INC. d/b/a BEE LINE CABLE
STATEMENT OF CPNI OPERATING PROCEDURES
Applicable from January 1, 2018 to December 31, 2018

Introductory Statement:

Bee Line, Inc. (the "Company"), is a small cable television provider in rural Maine. Through a contract with OTELCO, Inc., d/b/a OTT Communications, we provide phone service to some of our subscribers as part of our "triple play" package of cable television, broadband data, and VoIP telephone service. OTT Communications provides all of the interconnection facilities at their locations. The Company does the billing and collection for our subscribers who are provided telephone service.

As a cable television provider, the Company is subject to Section 631 of the Communications Act (47 U.S.C. § 551) which restricts its ability to collect or use customer Personally Identifiable Information (PII). Bee Line's CPNI policy is consistent with its obligations under Section 631.

Customer Proprietary Network Information

CPNI is defined in Section 222(1) of the Communications Act as (A) information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier (except that CPNI does not include subscriber list information).

Generally, CPNI includes personal information regarding a consumer's use of his or her telecommunications services. CPNI encompasses information such as: (a) the telephone numbers called by a consumer; (b) the telephone numbers calling a customer; (c) the time, location and duration of a consumer's outbound and inbound phone calls, and (d) the telecommunications and information services purchased by a consumer.

Call detail information (also known as "call records") is a category of CPNI that is particularly sensitive from a privacy standpoint and that is sought by pretexters, hackers and other unauthorized entities for illegitimate purposes. Call detail includes any information that pertains to the transmission of a specific telephone call, including the number called (for outbound calls), the number from which the call was placed (for inbound calls), and the date, time, location and/or duration of the call (for all calls).

Use and Disclosure of CPNI Is Restricted

The Company recognizes that CPNI includes information that is personal and individually identifiable, and that privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside the Company.

CPNI Policy

1. It is the policy of the Company 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 ID., 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.

2. The Company has established a program to inform and train personnel that they may not use, disclose, or permit access to CPNI for any purpose other than those set forth above. At present, the Company does not engage in outbound marketing using CPNI.

3. Because the Company does not use, disclose or permit access to CPNI except as described above, by definition, it does not need to maintain a record of sales and marketing campaigns that use customers' CPNI, or of instances where CPNI is disclosed to third parties, or where third parties were allowed access to CPNI.

4. Because the Company does not use CPNI except as described above, the Company does not utilize a notification and customer approval process (i.e., an Opt-Out or Opt-In process). If the Company changes its marketing procedures, an appropriate customer notification process will be instituted.

5. With respect to a customer's online access to their information, the company does not provide online access to any CPNI until the customer requesting such access receives a password that has been established without the use of readily available biographical information or account information.

6. Customers who contact the Company via inbound calls are not able to access their call detail information. If in the future the Company decides to convey call detail information to customers seeking such information via inbound calling, then the Company will take measures to secure the customer information with proper authentication, including the use of passwords and other methods that comply with FCC rules to protect call detail information. Billing personnel can provide CPNI data to customers by placing a return call to the customer's telephone number of record and/or mailing the requested information to the address of record, provided that the address of record has not changed within the previous 30 days.

7. Customers who present themselves at the Company's retail location and who request CPNI are asked for proper photographic identification (i.e., state issued driver's license or the equivalent). CPNI will be disclosed only if the customer presents valid photo ID matching the customer's account information. Any and all such customer requests: (1) must be made in writing; (2) must include the customer's correct billing name and address and telephone number; (3) must specify exactly what type or types of CPNI must be disclosed or provided; (4) must specify the time period for which the CPNI must be disclosed or provided; and (5) must be signed by the customer. The Company will disclose CPNI upon affirmative written request by the customer to any person designated by the customer, but only after the Company calls the customer's telephone number of record and/or sends a notification to the customer's address of record to verify the accuracy of this request.

8. The Company will provide a customer's phone records or other CPNI to a law enforcement agency in accordance with applicable legal requirements. OTT Communications is responsible for CALEA compliance.

9. The Company will notify the customer immediately if the customer's address of record is created (except at the time of service initiation) or changed. This notification is made by mail to the customer's pre-existing address of record, and does not reveal the changed information.

10. 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.

11. The Company has in place a supervisory review process regarding compliance with its CPNI policy.

STATEMENT OF ACTIONS TAKEN AGAINST DATA BROKERS

A. During Calendar Year 2018, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the Federal Communications Commission:

NONE

B. During Calendar Year 2018, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the various Public Utilities Commissions:

NONE

C. During Calendar Year 2018, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the following federal or state courts:

NONE

SUMMARY OF CUSTOMER COMPLAINTS REGARDING UNAUTHORIZED RELEASE OF CPNI

A. During Calendar Year 2018, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access by Company employees:

NONE

B. During Calendar Year 2018, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure to individuals not authorized to receive the information:

NONE

C. During Calendar Year 2018, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access to online information by individuals not authorized to view the information:

NONE

D. During Calendar Year 2018, the Company has become aware of the following processes that pretexters are using to attempt to access its CPNI:

NONE