

## **Statement of CPNI Procedures and Compliance**

### **Use of CPNI**

CallTower does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. CallTower has trained its personnel not to use CPNI for marketing purposes. Should CallTower elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR, 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.

### **PROTECTION OF CPNI**

CallTower has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.

CallTower uses numerous methods to protect customers CPNI. This includes software enhancements that identify whether a customer has approved use of its CPNI. Further, all CallTower employees are trained on how CPNI is to be protected and when it may or may not be disclosed. All marketing campaigns are reviewed by CallTower's Chief Marketing Officer to ensure that all such campaigns comply with applicable CPNI rules.

### **DISCLOSURE OF CALL DETAIL OVER PHONE**

CallTower has instituted authentication procedures to safeguard the disclosure of call detail over the telephone. CallTower's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Customers wishing to have access to billing information over the phone are required to authenticate their identity as a Main Point of Contact (MPOC). The policy is the same regardless if the call is initiated by CallTower or the customer.

### **NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES**

CallTower notifies customers whenever certain account changes occur. For example, whenever an online account is created or changed, or a password or other form of authentication (such as a "secret question and answer") is created or changed, CallTower will notify the account holder. Additionally, after an account has been established, when a customer's address (whether postal or e-mail) changes or is added to an account, CallTower will send a notification. These notifications may be sent to a postal or e-mail address, or by telephone, voicemail or text message.

### **DISCLOSURE OF CPNI**

CallTower may disclose CPNI in the following circumstances:

- When the customer has approved use of their CPNI for CallTower or CallTower and its business partners' sales or marketing purposes.
- When disclosure is required by law or court order.
- To protect the rights and property of CallTower or to protect customers and other carriers from fraudulent, abusive, or unlawful use of services.
- When a carrier requests to know whether a customer has a preferred interexchange carrier (PIC) freeze on their account.

- For directory listing services.
- To provide the services to the customer, including assisting the customer with troubles associated with their services.
- To bill the customer for services.

### **NOTIFICATION TO LAW ENFORCEMENT**

In the event CallTower experiences a privacy breach and CPNI is disclosed to unauthorized persons, in certain circumstances federal rules require CallTower to report such breaches to law enforcement and/or regulatory authorities. CallTower will inform its customers of a CPNI breach as and when required under applicable rules. Additionally, CallTower maintains records of any discovered breaches in accordance with federal rules and will retain these records for not less than two (2) years.

CallTower takes every reasonable precaution to protect the confidentiality of proprietary or personal customer information including secure storage of data, CPNI policy training for all employees with access to data, and strict adherence to the method and authorization required for release of CPNI.

### **ACTIONS AGAINST DATA BROKERS**

Company has not taken any actions against data brokers in the last year.

### **CUSTOMER COMPLAINTS ABOUT CPNI BREACHES**

Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2017.

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*Signature*

Bret L. England

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*Printed Name*

President & CEO

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*Title*

February 27, 2018

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*Date*