Mendocino Community Network

10700 Ford Street
P.O. Box 2445
Mendocino, CA 95460
(707) 937-1444 ext 123 • (800) 796-3896• fax (707) 937-0733
www.mcn.org • manager@mcn.org

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: 3/1/19

2. Name of company(s) covered by this certification: Mendocino Community Network

3. Form 499 Filer ID: 831389

4. Name of signatory: Sage Statham

5. Title of signatory: MCN Manager

6. Certification: I, Sage Statham, 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 CFR § 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 (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

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

The company has not received 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 CFR § 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 _____ 3/1/19

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STATEMENT OF CPNI OPERATING PROCEDURES

1. It is the policy of Mendocino Community Network ("MCN") 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 maintenance and repair of existing services.

c. For the purpose of protecting the rights or property of MCN, or to protect users of its services and other carriers from fraud, abusive, or unlawful use of or subscription to such services.

2. MCN 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, MCN does not engage in outbound marketing using CPNI. MCN has an express disciplinary process in place to discipline violations of its CPNI policy.

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

5. With respect to customers' online access to their billing and other information, MCN does not provide online access to any CPNI until the customer requesting such access provides a password that has been established by the customer without the use of readily available biographical information or account information.

6. Customers who contact MCN via inbound calls are not able to access their call detail information. If, in the future, MCN decides to convey call detail information to customers seeking such information via inbound calling, then MCN 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.

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7. Customers who present themselves at MCN's physical 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.

8. MCN 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.

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

10. MCN has in place a supervisory review process regarding compliance with its CPNI policy