

**Pembroke Telephone Company, Inc. -- FCC 499 Filer ID 809642**

**Pembroke Advanced Communications – FCC 499 Filer ID 824212**

Pembroke, GA

## **STATEMENT OF FCC CPNI RULES CERTIFICATION**

This statement serves to explain how Pembroke Telephone Company, Inc., an ILEC operating in Georgia and its affiliate Pembroke Advanced Communications (collectively “the Company” or “Company”) are in compliance with the Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained in Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 64.2000-2009).

*As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any segregation or refinement based on CPNI.*

### **1. Identification of CPNI**

The Company has established procedures and trained employees having access to or occasion to use customer data to identify what customer information is CPNI consistent with the definition of CPNI under the FCC’s rules at Section 64.2003(d) of the FCC’s Part 64, Subpart U CPNI rules.

### **2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services offered by the Company that affect how the Company uses CPNI.

### **3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to or occasion to use CPNI to identify uses of CPNI not requiring customer authorization under the FCC’s Part 64, Subpart U, Section 64.2005.

### **4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use, CPNI to identify uses of CPNI requiring customer authorization under the FCC’s Part 64, Subpart U, Section 64.2005 and/or Section 64.2008(d) as circumstances require.

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### **5. Customer Notification and Authorization Procedures**

Because the Company has not used and does not at this time plan to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company training and procedures have established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. In the event the Company undertakes to use CPNI for marketing and provides written notification, the Company's notification will comply with the requirements of the FCC's CPNI rules at Part 64, Subpart U, Section 64.2007(f)(2).

### **6. Training**

The Company has trained existing employees and will train new employees having access to CPNI regarding the FCC's CPNI rules.

### **7. Record of Customer CPNI Approval/Non-approval**

Prior to undertaking to use CPNI for marketing, the Company will develop a system for maintaining readily accessible records of whether and how a customer has responded under either Opt-In or Opt-Out approval as the case may be as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules..

### **8. Disciplinary Process**

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

### **9. Software Safeguards**

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

### **10. Supervisory Review Process for Outbound Marketing**

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 Part 64, Subpart U CPNI rules.