ANNUAL SECTION 64.2009(e) CERTIFICATION
EB Docket No. 06-36

Annual § 64.2009(e) CPNI Certification for 2014
Dated: February 22, 2015
Company: Inland Long Distance Company (*d/b/a* Inland Networks)
Form 499 Filer ID Number: 821938
Name of Signatory: James K. Brooks
Title of Signatory: Treasurer/Controller

I, James K. Brooks, certify that I am a duly authorized officer of Inland Long Distance Company ("ILDC" hereafter) and, acting as an agent of Inland, that I have personal knowledge that Inland has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information ("CPNI") rules of the Federal Communications Commission ("Commission"), codified at 47 C.F.R. Part 64 Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.

Attached to this certification is an accompanying statement explaining how ILDC's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

ILDC has not taken any actions (proceedings instituted or petitions filed by ILDC at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. During the calendar year ended December 31, 2014, ILDC did not acquire first-hand any information that it has identified as being information with respect to the processes pretexters are using to attempt to access CPNI.

Inland has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

James K. Brooks
Treasurer/Controller

STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. PART 64 SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)
MARCH 1, 2015

The following statement explains how the operating procedures of Inland Long Distance Company ("ILDC" or "Company") ensure that it is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. Part 64 Subpart U (§§ 64.2001-64.2011) and is relevant to calendar year 2014. Except as otherwise indicated, the following applies with respect to the Commission's rules in effect both before and after the December 8, 2007 effective date of the Commission's April 2, 2007 Report and Order in CC Docket No. 96-115. *See* FCC 07-22 (rel. Apr. 2, 2007); Public Notice, DA 07-4915 (rel. Dec. 6, 2007). This statement covers calendar year 2014.

I. Use of customer proprietary network information without customer approval.

A. ILDC may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already subscribes from ILDC, without customer approval.

B. ILDC may not use, disclose, or permit access to CPNI to market to a customer, service offerings that are within a category of service to which the subscriber does not already subscribe from ILDC, unless ILDC has customer approval to do so, except as described in Section I.C.

(1) ILDC may use, disclose or permit access to CPNI derived from their provision of local exchange service or interexchange service, without customer approval, for the provision of CPE and information services, such as call answering, voice mail or messaging, voice storage and retrieval services, and fax storage and retrieval services.

(2) ILDC may not use, disclose or permit access to CPNI to identify or track customers that call competing service providers except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto. The Company does not sell CPNI to any third-party for any purpose.

C. ILDC may use, disclose, or permit access to CPNI, without customer approval, as follows:

(1) ILDC may use, disclose, or permit access to CPNI, in its provision of inside wire installation, maintenance, and repair services.

(2) ILDC may use CPNI to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory

assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

D. ILDC may use, disclose, or permit access to CPNI to protect ILDC's rights or property; to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, ILDC's services; and to render, provision, bill or collect for services.

ILDC is a non-facilities based reseller, providing interexchange long distance service. ILDC's operating procedures comply with the above requirements and include, but are not limited to, the provisions described below. The Company does not engage in any outbound telemarketing. Outbound print marketing, if any, that may be distributed by the Company by mail is addressed to all subscribers or customers within the applicable geographic area, zip code(s) and/or telephone number prefix(es), without regard to the specific services that the subscriber or customer receives, or does not receive, from the Company and/or the Company's affiliates. Under Company policy, none of the Company's affiliates is permitted to use any CPNI of the Company for any outbound telemarketing or outbound print marketing.

Moreover, the Company does not use any CPNI for any inbound marketing of services that are not within a category of service (i.e., interexchange long distance) to which the customer already subscribes from the Company and/or one or more of the Company's affiliates. The Company does not sell, or provide access to any third party to, any of the Company's CPNI for purposes of marketing the services of the Company or of any of its affiliates, other than as permitted without prior customer approval with respect to the Company's affiliates. Except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto, and pursuant to Commission-mandated carrier change procedures, the Company does not provide CPNI to any third-party for any purpose.

The Company, its employees and agents may make such other uses and disclosures of, and permit access to, CPNI without customer approval as are permitted by applicable statute, rule, regulation or order. Such uses, disclosures or access may include those authorized by Sections 222(c) and (d) of the Communications Act of 1934, as amended, by Section 64.2005 of the Commission's rules and by orders of the Commission.

Except as set forth above, the Company does not provide any CPNI to any governmental entity, or to any other third party, other than: pursuant to subpoena or other lawful process or with the subscriber's prior written consent, or in accordance with the authentication and other requirement described at Section IV below and in the FCC's rules, as a result of a person representing himself or herself to be the subscriber (or the subscriber's duly authorized agent) and having confirmed his or her identity or authority by providing to the Company appropriate identifying information (such as Social Security Number, driver's license number, mother's maiden name, user name or password, as appropriate or otherwise required).

II. Approval required for use of customer proprietary network information.

A. ILDC may obtain customer approval through written, oral or electronic methods.

(1) ILDC does not seek or obtain oral approval, and therefore does not bear the burden of demonstrating that such approval has been given in compliance with the FCC's rules.

(2) A customer's approval or disapproval obtained by ILDC to use, disclose, or permit access to the customer's CPNI, the use of CPNI outside of the customer's total service relationship with ILDC must remain in effect until the customer revokes or limits such approval or disapproval.

(3) ILDC must maintain records of notification and approval, whether oral, written or electronic, for at least one year.

B. Use of Opt-Out and Opt-In Approval Processes.

(1) Except where use, disclosure, or access to CPNI is otherwise permitted without prior customer approval (as described above), ILDC only uses, discloses or permits access to CPNI upon opt-out or opt-in approval, consistent with Section 64.2007 of the Commission's rules and, by December 8, 2007, with the Commission's amended rules. ILDC's process is described in Section II.A above.

(2) Except for use and disclosure of CPNI that is permitted without customer approval under Section I, or that is described Section II.B, or as otherwise provided in section 222 of the Communications Act of 1934, as amended, ILDC may only use, disclose, or permit access to its customer's individually identifiable CPNI subject to opt-in approval.

The Company currently does not use CPNI in a manner that requires prior customer approval. Should ILDC's policy change, however, ILDC shall implement the foregoing policies to ensure the FCC's rules are complied with.

III. Notice required for use of customer proprietary network information.

A. Notification, Generally.

(1) Prior to any solicitation for customer approval, ILDC must provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.

(2) ILDC must maintain records of notification, whether oral, written or electronic, for at least one year.

B. Individual notice to customers must be provided when soliciting approval to use, disclose, or permit access to customers' CPNI.

C. Content of Notice.

Customer notification must provide sufficient information to enable the customer to make an informed decision as to whether to permit ILDC to use, disclose, or permit access to, the customer's CPNI.

(1) The notification must state that the customer has a right, and ILDC has a duty, under federal law, to protect the confidentiality of CPNI.

(2) The notification must specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.

(3) The notification must advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, ILDC may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.

(4) The notification must be comprehensible and must not be misleading.

(5) If written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.

(6) If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.

(7) ILDC may state in the notification that the customer's approval to use CPNI may enhance ILDC's ability to offer products and services tailored to the customer's needs. ILDC also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

(8) ILDC may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

(9) The notification must state that any approval or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from ILDC is valid until the customer affirmatively revokes or limits such approval or denial.

(10) ILDC's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

D. Notice Requirements Specific to Opt-Out.

ILDC must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except as provided in paragraph F of this section). The

contents of any such notification must comply with the requirements of paragraph C of this section.

(1) ILDC must wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. ILDC may, in its discretion, provide for a longer period. ILDC must notify customers as to the applicable waiting period for a response before approval is assumed.

(i) In the case of an electronic form of notification, the waiting period shall begin to run from the date on which the notification was sent; and

(ii) In the case of notification by mail, the waiting period shall begin to run on the third day following the date that the notification was mailed.

(2) Insofar as ILDC is using the opt-out mechanism, it must provide a Notice to its customers every two years.

(3) If ILDC uses e-mail to provide opt-out notices, it must comply with the following requirements in addition to the requirements generally applicable to notification:

(i) ILDC must obtain express, verifiable, prior approval from consumers to send notices via e-mail regarding its service in general, or CPNI in particular;

(ii) ILDC must allow customers to reply directly to e-mails containing CPNI notices in order to opt-out;

(iii) Opt-out e-mail notices that are returned to ILDC as undeliverable must be sent to the customer in another form before ILDC may consider the customer to have received notice;

(iv) ILDC must ensure that the subject line of the message clearly and accurately identifies the subject matter of the e-mail; and

(v) ILDC must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. ILDC may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

E. Notice Requirements Specific to Opt-In.

ILDC may provide notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the requirements of paragraph C of this section.

F. Notice Requirements Specific to One-Time Use of CPNI.

(1) ILDC may use oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether ILDC uses opt-out or opt-in approval based on the nature of the contact.

(2) The contents of any such notification must comply with the requirements of paragraph C of this section, except that ILDC may omit any of the following notice provisions if not relevant to the limited use for which ILDC seeks CPNI:

(i) ILDC need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election;

(ii) ILDC need not advise customers that they may share CPNI with their affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party;

(iii) ILDC need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as ILDC explains to customers that the scope of the approval ILDC seeks is limited to one-time use; and

(iv) ILDC may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as ILDC clearly communicates that the customer can deny access to his CPNI for the call.

The Company currently does not use CPNI in a manner that requires prior customer approval. Should ILDC's policy change, however, ILDC shall implement the foregoing policies to ensure the FCC's rules are complied with.

IV. Safeguards required for use and disclosure of customer proprietary network information.

A. ILDC must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. ILDC's policies and procedures are detailed in Section II above.

B. Effective December 8, 2007, ILDC may release call detail information during a customer initiated telephone contact only if reasonable authentication procedures are complied with and (1) the customer provides ILDC with a pre-established password, (2) ILDC, at the customer's request, sends the call detail information to the customer's address of record provided the address of record has been associated with the account for at least thirty (30) days, or (3) when ILDC calls the telephone number of record to disclose the call detail information. ILDC is permitted to create a back-up customer authentication method for lost or forgotten passwords. ILDC is also prohibited from releasing call detail information during a retail visit without the appropriate password or valid photo identification.

However, if the during a customer-initiated telephone contact, the customer is able to provide without assistance from ILDC personnel all of the call detail information necessary to

address a customer service issue (i.e., the telephone number called, when it was called, and if applicable the amount charged for the call), then ILDC personnel are permitted to proceed with its routine customer care procedures.

C. As of June 8, 2008, ILDC must authenticate a customer without readily available biographical or account information prior to allowing the customer on-line access to CPNI related telecommunication service account. Once authenticated, the customer may only obtain on-line access to CPNI related telecommunications service account through a password.

D. Effective December 8, 2007, ILDC is required to notify customers immediately when a password or back-up means of authentication for lost or forgotten passwords, on-line account, or address of record is created or changed. Such notification is not required when the customer initiates service, including the selection of a password.

E. Business customers are exempt from the password requirements which became effective December 8, 2007, if: the customer is contractually bound to ILDC, is serviced by a dedicated ILDC account representative as the primary contact, and within the contract ILDC is responsible to address its CPNI obligations. If, at any point, the business customer must go through a call center to reach a customer service representative, then the exemption does not apply.

F. ILDC trains its personnel as to when they are and are not authorized to use CPNI, and ILDC must have an express disciplinary process in place.

G. ILDC must maintain a record, electronically or in some other manner, of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. ILDC shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. ILDC shall retain the record for a minimum of one year.

H. ILDC must establish a supervisory review process regarding its compliance with the FCC's CPNI rules for outbound marketing situations and maintain records of its compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

I. Effective December 8, 2007, ILDC must take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, which may include encryption of its databases. ILDC must properly authenticate a customer prior to disclosing CPNI based on a customer-initiated telephone contact, on-line account access, or an in-store visit.

ILDC must take measures to protect CPNI stored in its internal databases from potential unauthorized access, and evaluate and increase its security measures should it discover an increase in attempts to gain access to unauthorized information.

J. ILDC must provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(1) The notice shall be in the form of a letter, and shall include ILDC's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2) Such notice must be submitted even if ILDC offers other methods by which consumers may opt-out.

K. Effective December 8, 2007, ILDC has a general duty to first inform federal law enforcement agencies, followed up by notification to affected customers, after reasonable determination of a breach of its customers' CPNI.

(1) ILDC must file an electronic notification to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) within seven (7) business days through the central reporting facility furnished by the Commission.

(2) ILDC is prohibited from notifying customers or the general public of the breach until seven (7) business days have passed after notification to the USSS and FBI unless under certain specified circumstances: (a) ILDC identifies an "extraordinary need to notify customers" before that period or (b) An ongoing or potential investigation or national security requires customer disclosure to be potentially delayed for up to thirty (30) days. ILDC must notify the affected customer(s) after the applicable period.

(3) ILDC must maintain a record, whether electronically or in some other manner of any breaches discovered, notifications made to the USSS or FBI and notifications made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Records must be maintained for a two (2) year period.

ILDC's operating procedures comply with all of the above requirements, including those that became effective December 8, 2007. With respect to online authentication in particular, ILDC has implemented measures to ensure compliance of the applicable June 8, 2008 deadline. As previously discussed, the Company currently does not use CPNI in a manner that requires prior customer approval. Should ILDC's policy change, however, ILDC shall implement the relevant aforementioned policies to ensure the FCC's rules are complied with. ILDC notes in particular that:

- ***Company personnel are trained as to when they are and are not authorized to use CPNI, and that an express process is in place such that violations of these procedures may result in disciplinary action, up to and including termination of employment.***
- ***ILDC does not provide customers' with online access to their CPNI at this time.***
- ***With respect to business customers subject to Section IV.E above, ILDC requires them to provide the names of all that are authorized to have access to the account and at what authorization level (e.g. to make service changes, request additional services,***

billing inquiries) and further requires that a 6 to 10-place alphanumeric password be established.

- ***Operating procedures have been implemented to comply with the remaining requirements described above and applicable to ILDC's use, disclosure of and third party access to CPNI.***

V. Supplemental Information

Effective December 8, 2007, the FCC's rules require that the annual certification filed pursuant to 47 C.F.R. § 64.2009(e) disclose any actions taken against data brokers and a summary of all consumer complaints received in the previous calendar year regarding the unauthorized release of CPNI. ILDC is not aware of any consumer complaints regarding the unauthorized release of CPNI and has not taken action against any data brokers.