

**STATEMENT REGARDING OPERATIONS PROCEDURES IMPLEMENTING 47 C.F.R.  
SUBPART U GOVERNING THE USE OF CUSTOMER PROPRIETARY NETWORK  
INFORMATION ("CPNI")**

Telecall Telecommunications, Corp. (Telecall) has established policies and procedures to assure compliance with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U-Customer Proprietary Information ("CPNI") § 64.2001et. seq. of the Commission's rules.

I. Use Of CPNI Without Customer Approval

A. Telecall may use, disclose, or permit access of CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already subscribes from Telecall, without customer approval. Telecall does not share customer CPNI with any affiliates, joint ventures partners, or contractors.

B. Telecall does 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 Telecall, without customer approval as described in Section I.C

(1) Telecall may use, disclose, or permit access to CPNI derived from the provision of interexchange service, without customer approval for the provision of CPE and information service(s)

(2) Telecall may not and does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers. For example Telecall cannot use interexchange CPNI to track all customer that call long distance competitors.

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

1. Telecall may use, disclose, or permit access to CPNI in its provision of inside wiring, maintenance, and repair services

2. Telecall may use, disclose, or permit access to CPNI for the purpose of conducting research on the health effects of CMRS

3. Telecall may use CPNI to market services formally 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. Telecall may use, disclosure, or permit access to CPNI to protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

II. Approval Required For Use Of CPNI Telecall does not obtain approvals for use of CPNI because Telecall does not use or disclose customer CPNI in any manner that requires customer approval. Telecall's operating procedures generally prohibit the disclosure of CPNI for the purpose of marketing communications-related services to existing customers by its agents, joint venture partners, and independent contractors.

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III. Notice Required For Use Of CPNI Telecall does not use customer CPNI for any purposes which currently require customer approval. In the event that at a future time Telecall wishes to use customer CPNI in a manner that requires customer approval, it will do so in accordance with the approval and notice requirements specified in Sections 47 CFR 64.2007 - 64.2008 of the Commission's rules.

IV. Safeguards On The Disclosure Of Customer Proprietary Network Information. Telecall has procedures in place to assure that customers are properly authenticated prior to disclosing CPNI. Telecall authenticates a customer proper to disclosing CPNI as follows:

(a) **In person** - the customer must be personally known by the employee or the customer must provide a valid photo ID matching the customer's account information.

(b) **Telephone access to CPNI.** Telecall will only disclose call detail information over the telephone, based on customer-initiated telephone contact, if the customer first provides Telecall with a password, as described in paragraph (d) below that is not prompted by the carrier asking for readily available biographical information, or account information. If the customer does not provide a password, Telecall will only disclose call detail information by sending it to the customer's address of record, or by call detail information to Telecall during a customer-initiated call without Telecall's assistance, then Telecall may discuss the call detail information provided by the customer.

(c) **Online access to CPNI.** Telecall will authenticate a customer without the use of readily available biographical information, or account information, prior to allowing the customer online access to CPNI related to the telecommunications service account. Once authenticated, the customer may only obtain online access to CPNI related to a telecommunications service account through a password that is not prompted by Telecall asking for readily available biographical information, or account information.

(d) **Establishment of a Password and Back-up Authentication Methods for Lost or Forgotten Passwords.** To establish a password, Telecall authenticates the customer without the use of readily available biographical information, or account information. Telecall may create a back-up customer authentication method in the event of a lost or forgotten password, but such back-up customer authentication method may not prompt the customer for readily available biographical information, or account information. If a customer cannot provide the correct password or the correct response for the back-up customer authentication method, the customer must establish a new password as described in this paragraph.

(e) **Notification of account changes.** Telecall promptly notifies customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed. This notification may be through a voicemail or text message sent by Telecall to the telephone number of record, or by mail to the address of record, and will not reveal the changed information or be sent to the new account information.

(f) **Business customers** Telecall and its business customers address issues of CPNI protection specifically in their contracts, the terms of which may or may not differ from those identified in paragraphs (a) through (e) above. Telecall's business customers each have a dedicated account representative.

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V. Notification of Customer Proprietary Network Information Security Breaches - In the case of a breach, Telecall will as soon as practicable, and in no event later than seven (7) business days after reasonable determination of the breach, electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) through the FCC link at <http://www.fcc.gov/eb/cpni>.

(a) Notify customers only after 7 full business days have passed after notification to the USSS and the FBI unless the USSS or FBI has requested an extension.

(b) If there is an extraordinarily urgent need to notify affected customers or the public sooner in order to avoid immediate and irreparable harm, it will be done only after consultation with the relevant investigating agency. Telecall shall cooperate with the relevant investigating agency's request to minimize any adverse effects of such customer notification.

(c) Maintain a record of any breaches discovered, notifications made to the USSS and the FBI and notifications made to customers. The record will 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. Telecall shall retain the record for a minimum of 2 years.

(d) Include a summary of the breach in the annual compliance certificate filed with the FCC.

#### VI. Record Retention

Telecall shall retain all information regarding CPNI. Following are the minimum retention periods Telecall has established:

- CPNI notification and records of approval if used - five years
- Marketing campaign if used - one year
- Breaches: five years
- Annual Certification - five years
- Employee training certification - five years
- All other information - two years

