northpenn
FAMILY OF SERVICES

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February 4, 2016

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Re: EB Docket No. 06-36
Section 64.2009(e) CPNI Certification
North Penn Long Distance Corporation (Form 499-A Filer ID No. 826257)

Dear Ms. Dortch:

Attached for filing is a Section 64.2009(e) Customer Proprietary Network Information certification and accompanying statement covering the prior calendar year 2015 of North Penn Long Distance Corporation (Form 499-A Filer ID No. 826257)

If you have any questions or require additional information, please call me at 607-522-4237 or email at tpresti@etcnpt.com.

Best Regards,

Thomas F. Prestigiacomo
Chief Financial Officer

Attachments

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2016 covering the prior calendar year 2015

1. Date filed: February 4, 2016
2. Name of company(s) covered by this certification: North Penn Long Distance Corporation
3. Form 499 Filer ID: 826257
4. Name of signatory: Thomas F Prestigiacomo
5. Title of signatory: CFO
6. Certification:

I, Thomas F. Prestigiacomo, 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 C.F.R. § 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, safeguards, training, 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. C.F.R. § 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

Attachments: Accompanying Statement explaining CPNI procedures

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NORTH PENN LONG DISTANCE CORPORATION
STATEMENT OF COMPANY POLICY

When referred to in the guidelines set for below, "Company," "we," or "us" refers to and includes all employees, associates, and agents of North Penn Long Distance Corporation

North Penn Long Distance Corporation (the "Company") has a duty to protect the confidential, Customer Proprietary Network Information ("CPNI") of our customers, other telecommunications carriers, and equipment manufacturers. Therefore, the following guidelines shall be followed by all employees and agents of the Company:

CPNI is any information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship. CPNI also includes information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of a carrier.

- Proprietary information of our customers, other telecommunications carriers, and equipment manufacturers is protected by Federal law.
- CPNI which the Company obtains from another carrier for the purpose of providing a particular telecommunications service may be used only for the provision of that service, and may not be used for any otherwise unrelated marketing efforts.
- Individually identifiable CPNI that we obtain by providing a telecommunications service may be used, disclosed, or released *only* in the circumstances as set forth in the Company's CPNI Operating Guidelines.

The release of any CPNI by sales personnel must be authorized by a supervisor.

The Company takes seriously the protection of our customers' CPNI, and in accordance with 47 C.F.R. § 64.2009 will be subject to disciplinary review for violation of the policies set forth above. Please contact your supervisor if you have any questions or require additional information.

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Company Operating Guidelines Relating to Customer Proprietary Network Information

I. Introduction.

North Penn Long Distance Corporation (the "Company") has implemented the procedures outlined in the following Operating Guidelines relating to Customer Proprietary Network Information ("CPNI"). Through the implementation and following of these Operating Guideline, the Company intends to ensure its compliance with the Communications Act of 1934, as amended, and related regulations regarding CPNI that have been adopted by the Federal Communications Commission ("FCC"). Accordingly, from time to time, these guidelines may change based on changes in the governing law or FCC regulations.

CPNI, according to federal law, is (a) information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of the Company, and that is made available to the Company by the customer solely by virtue of the Company-customer relationship; and (b) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of the Company. This type of information includes personal information such as: the telephone numbers called by a customer; the length of phone calls; and services purchased by a customer, such as call waiting.

Federal law also contemplates data referred to as "customer information" and "subscriber list information." These types of data do not involve personal, individually-identifiable information. Aggregate customer information is data that relates to a group or category of customers from which individual customer identities and characteristics have been removed; subscriber list information is data such as subscriber names, addresses, and telephone numbers. The Company's Operating Guidelines address only federal regulations that are applicable to CPNI.

In accordance with federal law, the Company may use, disclose, or permit access to CPNI in its provision of (a) the telecommunications service from which such information is derived, or (b) services necessary to, or used in the provision of that telecommunications service, including the publication of telephone directories.

The Company may obtain approval from the customer to access and use that customer's CPNI through either "Opt-out" or "Opt-in" methods. The Company may, subject to opt-out approval or opt-in approval, use its customer's individually identifiable CPNI for the purpose of marketing communications-related services to that customer. The Company may, subject to opt-out approval or opt-in approval, disclose its customer's individually identifiable CPNI, for the purpose of marketing communications-related services to that customer, to its agents and its affiliates that provide communications-related services. The Company may also permit such persons or entities to obtain access to such CPNI for such purposes. Except for use and disclosure of CPNI that is permitted without customer approval under Section II.C, below, or that is described in this paragraph, or as otherwise provided in section 222 of the Communications Act of 1934, as amended, the Company may only use, disclose, or permit access to its customer's individually identifiable CPNI subject to opt-in approval. The "Opt-in" and "Opt-out" methods are described below in Sections IV.D and IV.E.

II. Limitations on Company Use of CPNI.

It is the general policy of the Company to not use CPNI. If, however, CPNI is used, then the use of CPNI by the Company will be only in accordance with the following guidelines.

A. Scope of Use

The Company may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service (*i.e.*, local, interexchange, and CMRS) to which our customer already subscribes without customer approval.

If a customer subscribes to more than one category of service offered by our Company, then the Company may share CPNI among our affiliated entities that provide a service offering to the customer.

If a customer does not subscribe to more than one offering of our Company, then the Company will not share that customer's CPNI with its affiliates, except in accordance with the Opt-out and Opt-in procedures described below (Sections IV.D and IV.E, below).

B. Permitted and Non-Permitted Use of CPNI by the Company

The Company will 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 our Company, unless the Company has obtained the customer's approval to do so. The Company may use CPNI without customer consent only in accordance with Section II.C, below.

The Company does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers. For example, customer service representatives and other Company personnel may not use local service CPNI to track all customers that call local service competitors.

C. Use of CPNI without Customer Approval

The Company may use, disclose, or permit access to CPNI, without customer approval, only as described below.

If the Company provides Commercial Mobile Radio Service ("CMRS"), then the Company may use, disclose, or permit access to CPNI derived from its provision of CMRS, and may do so without customer approval for the provision of Customer Premises Equipment ("CPE") and information service(s).

Similarly, the Company may use, disclose or permit access to CPNI derived from its provision of local exchange service and may do so without customer approval for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

Finally, if the Company provides interexchange services (typically referred to as "long distance" service), the Company may use, disclose or permit access to CPNI derived from its provision of interexchange service and may do so without customer approval for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

The Company may use, disclose, or permit access to CPNI, without customer approval, in its provision of inside wiring installation, maintenance, and repair services.

Where applicable, the Company may use, disclose, or permit access to the CPNI of its CMRS customers for the purpose of conducting research on the health effects of CMRS.

The Company may use CPNI, without customer approval, 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.

The Company may use, disclose, or permit access to CPNI to protect the rights or property of the Company, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

III. Approval Required for Use of CPNI.

A. General Policies Regarding Customer Approvals to Use CPNI

The Company may obtain a customer's approval to use CPNI through written, oral or electronic methods.

If the Company relies upon a customer's oral approval, then the Company will bear the burden of demonstrating that such approval was given in compliance with applicable FCC rules.

The customer's approval or disapproval to use, disclose, or permit access to that customer's CPNI shall remain in effect until the customer revokes or limits such approval or disapproval.

The Company will maintain records of approval, whether oral, written or electronic, for at least one year.

B. Use of CPNI Where Customer Approval is Received

The Company may use either "Opt-out" or "Opt-In" approval processes as provided for in applicable FCC regulations in order to use a customer's CPNI. These approval processes are described in Sections IV.D and IV.E, below,

Where approval for the use of CPNI is received by the Company from the customer, the Company may use a customer's individually identifiable CPNI for the purpose of marketing communications-related services to that customer. Likewise, where this approval is received, the Company may also disclose a customer's individually identifiable CPNI for the purpose of marketing communications-related services to that customer, to its agents, and to its affiliates that provide communications-related services. Further, where approval has been received by the customer of the use by the Company of his/her CPNI, the Company may also permit such persons or entities to obtain access to such CPNI for such purposes. Except for use and disclosure of CPNI that is permitted without customer approval as described in Section II, above, or via an Opt-in or Opt-out authorization described in Sections IV.D. and IV.E, below, the Company may only use, disclose, or permit access to its customers' individually identifiable CPNI subject to Opt-in approval.

IV. Notice Required for Use of CPNI.

A. General Requirement

The Company shall provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI prior to any solicitation for customer approval.

The Company will maintain records of notification, whether oral, written or electronic, for at least one year.

B. Individual Notice Under Certain Circumstances

The Company shall provide individual notice to customers when soliciting approval to use, disclose, or permit access to customers' CPNI.

C. Elements that shall be Included in any Customer Notice (Opt In and Opt Out)

The customer notification shall provide sufficient information to enable the customer to make an informed decision as to whether to permit the Company to use, disclose, or permit access to, the customer's CPNI. The Company's notification will comply with the following:

1. The notification shall state that the customer has a right, and the Company has a duty, under federal law, to protect the confidentiality of CPNI.

2. The notification shall 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 shall advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must state clearly that a denial of approval will not affect the provision of any services to which the customer subscribes. However, the Company may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI, *i.e.,* that the Company may be unable to market to the customer products and services tailored to the customer's needs.

4. The notification shall be comprehensible and shall not be misleading.

5. If written notification is provided, then the notice shall 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 shall be translated into that language.

7. The Company may state in the notification that the customer's approval to use CPNI may enhance the Company's ability to offer products and services tailored to the customer's needs. The Company 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. The Company shall not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

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

10. The Company's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

D. Opt-out Approval

"Opt-out approval" is a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Under this approval method, a customer is deemed to have consented to the use, disclosure, or access to the customer's CPNI if the customer has failed to object to the Company's use of the customer's CPNI after the customer is provided appropriate notification of the Company's request for consent that is provided in a manner consistent with the applicable federal rules and these Operating Guidelines.

The Company may provide a customer notification to obtain her/his Opt-out approval through electronic or written methods. Except as provided in Section IV.F, the Company will provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication.

The contents of any such notification shall comply with the standards described in Section IV.C, above. The Company may use Opt-out approval to obtain a customer's consent to share CPNI among the Company's affiliates.

Where the Company elects to use the Opt-out approval process, the Company shall wait 30-days (or in its discretion a longer period of time) after giving customers such notice and an opportunity to Opt-out before assuming customer approval to use, disclose, or permit access to CPNI. In all events, the Company shall notify customers as to the applicable waiting period for a response before approval is assumed.

If the Company uses an electronic form of notification, then the waiting period shall begin to run from the date on which the notification was sent

If the Company sends notification by mail, then the waiting period shall begin to run on the third day following the date that the notification was mailed.

If the Company uses Opt-out notification, then the Company will provide notices to its customers every two years.

If the Company uses e-mail to provide Opt-out notices, then it will comply with the following federal requirements, in addition to the requirements generally applicable to notification:

1. The Company will obtain express, verifiable, prior approval from consumers to send notices via e-mail regarding their service in general, or CPNI in particular;

2. The Company will allow customers to reply directly to e-mails containing CPNI notices in order to Opt-out;

3. If an Opt-out e-mail notice is returned to the Company as undeliverable, then it will be sent to the customer in another form before the Company will consider the customer to have received notice;

4. The Company will ensure that the subject line of e-mail messages containing CPNI notices will identify clearly and accurately the subject matter of the e-mail; and

5. The Company will 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. The Company 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. Opt-in Approval

"Opt-in approval" is a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. This approval method requires that the Company obtain from the customer affirmative, express consent allowing the requested CPNI usage, disclosure, or access after the customer is provided appropriate notification of the Company's request consistent with applicable Federal regulations as reflected in these Operating Guidelines. The Company may provide notification to obtain Opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the standards of Section IV.C, above.

F. One-Time Use of CPNI

The Company 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 the Company uses Opt-out or Opt-in approval based on the nature of the contact.

The contents of any such notification must comply with the requirements of Section IV.C, above, except that the Company may omit any of the following notice provisions if not relevant to the limited use for which the Company seeks CPNI:

1. The Company need not advise customers that if they have opted-out previously, no action is needed to maintain the Opt-out election;

2. If the Company's limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party, then the Company need not advise customers that the Company may share their CPNI with the Company's affiliates or third parties and need not name those entities,

3. The Company need not disclose the means by which a customer can deny or withdraw future access to CPNI, but the Company must then explain to customers that the scope of the approval the Company seeks is limited to one-time use; and

4. If the Company communicates clearly that the customer can deny access to his CPNI for the call, then the Company may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI.

V. Company Safeguards for Use of CPNI.

A. Approval System

The Company shall implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of that customer's CPNI.

B. Training

The Company shall train its personnel as to when they are and are not authorized to use CPNI, and the Company shall have an express disciplinary process in place for non-compliance with the Company's safeguards for use of CPNI.

C. CPNI Coordinator

The Company shall appoint a CPNI Coordinator who will supervise implementation and adherence to these Operating Guidelines.

D. Records

The Company shall maintain a record, electronically or in some other manner, of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. The Company 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. This record shall 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. The Company shall retain the record for a minimum of one year.

E. Supervision of Compliance

The Company shall establish a supervisory review process regarding its compliance with federal regulations regarding outbound marketing situations and maintain records of its compliance for at least one year. Sales personnel shall obtain supervisory approval of any proposed outbound marketing request for customer approval.

F. Compliance Certification

An officer, as an agent of the Company, shall sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with federal CPNI regulations. The Company shall include with the certification a statement explaining how the Company's operating procedures ensure that it is or is not in compliance with the rules in this subpart. Additionally, the Company shall include with its certification an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. The Company shall make this filing annually with the Enforcement Bureau of the FCC on or before March 1 in EB Docket No. 06–36, for data pertaining to the previous calendar year.

G. Notice of Non-Compliance

The Company shall provide to the FCC written notice within five business days 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. The notice shall be in the form of a letter, and will include the Company's name, a description of the Opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when the Company will/did implement it, 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. The Company shall provide such notice even if the Company offers other methods by which consumers may Opt-out, and only one of those methods was affected.

VI. Company Safeguards on the Disclosure of CPNI

A. Safeguarding CPNI

The Company shall take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. The Company shall properly authenticate a customer prior to disclosing CPNI based on customer-initiated telephone contact, online account access, or an in-store visit.

1. Telephone access to CPNI

The Company may only disclose call detail information over the telephone, based on customer-initiated telephone contact, if the customer first provides the carrier with a password, as described in paragraph VI.B, 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, the Company may only disclose call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record. If the customer is able to provide call detail information to the Company during a customer-initiated call without the Company's assistance, then the Company may discuss the call detail information provided by the customer.

2. Online access to CPNI

The Company shall 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 Company's service account with that customer. Once authenticated, the customer may only obtain online access to CPNI related to his/her telecommunications service account through a password, as described in paragraph VI.B, below, that is not prompted by the Company asking for readily available biographical information, or account information.

3. In-store access to CPNI

The Company may disclose CPNI to a customer who, at the Company's retail location, first presents to the Company or its agent a valid photo ID matching the customer's account information.

B. Establishment of a Password and Back-up Authentication Methods for Lost or Forgotten Passwords

To establish a password, the Company shall authenticate the customer without the use of readily available biographical information, or account information. The Company may create a back-up customer authentication method in the event of a lost or forgotten password, but the Company's back-up customer authentication method shall 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.

C. Notification of account changes

The Company shall notify customers immediately 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 is not required when the customer initiates service, including the selection of a password at service initiation. This notification may be through a Company-originated voicemail or text message to the telephone number of record, or by mail to the address of record, and must not reveal the changed information or be sent to the new account information.

D. Business customer exemption

The Company may bind itself contractually to authentication regimes other than those described in this Section VI for services it provides to its business customers that have both a dedicated account representative and a contract that specifically addresses the Company's protection of CPNI.

E. Definitions

The following definitions of certain terms used in this Section VI shall govern the implementation and interpretation of the requirements of this Section VI.

Account information

"Account information" shall mean that information that is specifically connected to the customer's service relationship with the carrier, including such things as an account number or any component thereof, the telephone number associated with the account, or the bill's amount.

Address of record

An "address of record," whether postal or electronic, shall mean an address that the Company has associated with the customer's account for at least 30 days.

Call detail information

"Call detail information" shall mean any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any call.

Readily available biographical information

"Readily available biographical information" shall mean information drawn from the customer's life history and includes such things as the customer's social security number, or the last four digits of that number; mother's maiden name; home address; or date of birth.

Telephone number of record

A "telephone number of record" shall mean the telephone number associated with the underlying service, not the telephone number supplied as a customer's "contact information."

Valid photo ID

A "valid photo ID" shall mean a government-issued means of personal identification with a photograph such as a driver's license, passport, or comparable ID that is not expired.

VII. Notification of CPNI Security Breaches

A. Notification to Law Enforcement

The Company shall notify law enforcement of a breach of its customers' CPNI as provided in this Section VII. The Company shall not notify its customers or disclose the breach publicly, whether

voluntarily or under state or local law or these rules, until it has completed the process of notifying law enforcement pursuant to Section VI.A.

As soon as practicable, and in no event later than seven (7) business days, after reasonable determination of the breach, the Company shall electronically notify the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") through a central reporting facility. The internet link to the reporting facility that shall be used by the Company shall be that maintained by the FCC at *http://www.fcc.gov/eb/cpni.*

Notwithstanding any state law to the contrary, the Company shall not notify customers or disclose the breach to the public until 7 full business days have passed after notification to the USSS and the FBI except if the Company believes that there is an extraordinarily urgent need to notify any class of affected customers sooner than the seven (7) business days provided for in Section VII.A, in order to avoid immediate and irreparable harm, the Company shall so indicate in its notification and may proceed to immediately notify its affected customers only after consultation with the relevant investigating agency. The Company shall cooperate with the relevant investigating agency's request to minimize any adverse effects of such customer notification.

If the relevant investigating agency determines that public disclosure or notice to customers would impede or compromise an ongoing or potential criminal investigation or national security, such agency may direct the Company not to so disclose or notify for an initial period of up to 30 days. Such period may be extended by the agency as reasonably necessary in the judgment of the agency. If such direction is given, the agency shall notify the Company when it appears that public disclosure or notice to affected customers will no longer impede or compromise a criminal investigation or national security. The agency shall provide in writing its initial direction to the Company, any subsequent extension, and any notification that notice will no longer impede or compromise a criminal investigation or national security and such writings shall be contemporaneously logged on the same reporting facility that contains records of notifications filed by the Company.

B. Customer Notification

After the Company has completed the process of notifying law enforcement pursuant to Section VII.A, the Company shall notify its customers of a breach of those customers' CPNI.

C. Recordkeeping

The Company shall maintain a record, electronically or in some other manner, of any breaches discovered, notifications made to the USSS and the FBI pursuant to Section VII.A, and notifications made to customers pursuant to Section VII.B. The record shall 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. The Company shall retain the record for a minimum of 2 years.

D. Definitions

As used in this section, a "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI.

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