

## **STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION**

In accordance with Section 222 of the Communications Act and the Federal Communications Commission's ("FCC") CPNI Rules (47 C.F.R. § 64.2001, et seq.), ROI Networks, LLC ("ROI Networks, LLC") files this Statement of Policy outlining the Company's procedures for accessing, using and storing Customer Proprietary Network Information ("CPNI").

ROI Networks, LLC provides telecommunications services to retail customers. Because ROI Networks, LLC may access, use, or store CPNI when providing these types of services, the Company undertakes the steps outlined in this Statement of Policy to protect CPNI from unauthorized access or misuse.

### **Definition of CPNI**

Under federal law, CPNI is certain customer information obtained by a telecommunications provider during the course of providing telecommunications services (including interconnected VoIP) to a customer. This includes information relating 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.

Examples of CPNI include information typically available from telephone-related details on a monthly bill such as the types of services purchased by a customer, numbers called, duration of calls, directory assistance charges, and calling patterns. CPNI does not include names, addresses, and telephone numbers, because that information is considered subscriber list information under applicable law.

### **Use of CPNI**

It is the policy of ROI Networks, LLC not to use CPNI for any activity other than as permitted by applicable law. Any disclosure of CPNI to other parties (such as affiliates, vendors and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by ROI Networks, LLC to the customer. Except in instances where ROI Networks, LLC is required by law to disclose CPNI, such as through subpoenas or other requests by law enforcement officials, or if the intended use is permitted by FCC Rules, ROI Networks, LLC will first obtain the customer's consent prior to using or sharing CPNI.

### **Wholesale Services**

With regards to wholesale services, ROI Networks, LLC typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service. Nevertheless, the company will follow all CPNI policies outlined within the Statement of Policy, to the extent applicable to its wholesale services.

### **Disclosure of CPNI**

ROI Networks, LLC prohibits the release of CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances.

- When the customer has pre-established a password;

and marketing campaigns that use the CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.

ROI Networks, LLC will also implement a system to obtain prior approval and informed consent from its customers in accordance with the CPNI Rules. This system will allow for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.

Prior to commencement of a sales or marketing campaign that utilizes CPNI, ROI Networks, LLC will establish the status of a customer's CPNI approval. The following sets forth the procedure that will be followed by the Company:

- Prior to any solicitation for customer approval, ROI Networks, LLC will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
- ROI Networks, LLC will use opt-in approval for any instance in which Company must obtain customer approval prior to using, disclosing or permitting access to CPNI.
- A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.
- Records of approvals are maintained for at least one year.
- ROI Networks, LLC provides individual notice to customers when soliciting approval to use, disclose or permit access to CPNI.
- The CPNI notices sent by ROI Networks, LLC comply with FCC Rule 64.2008(c).

ROI Networks, LLC will also establish a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one (1) year.

## **FCC Notification**

The Company is prepared to provide written notice within five (5) business days to the FCC of any instance where the opt-in mechanisms do not work properly or to such a degree that consumers' inability to opt-in is more than an anomaly.

## **Third Party Use of CPNI**

To safeguard CPNI, prior to allowing joint venturers or independent contractors access to customers' individually identifiable CPNI, ROI Networks, LLC will require all such third parties to enter into a confidentiality agreement that ensures compliance with this Statement of Policy. ROI Networks, LLC shall also obtain opt-in consent from a customer prior to disclosing the information to such third parties for marketing purposes. In addition, ROI Networks, LLC requires all outside agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.

ROI Networks, LLC requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.

ROI Networks, LLC does not market or sell CPNI information to any third party.

## **Law Enforcement Notification of Unauthorized Disclosure**

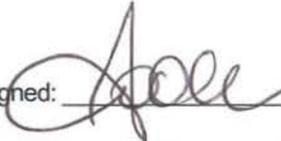
**ROI Networks, LLC**  
**Annual CPNI Certification**  
**47 C.F.R. § 64.2009(e)**  
**EB Docket No. 06-36**

COMPANY NAME: ROI Networks, LLC  
REPORTING PERIOD: January 1, 2015 - December 31, 2015  
FILER ID: 831078  
OFFICER: Todd Stires  
TITLE: President/COO

I, Todd Stires, hereby certify that I am an officer of ROI Networks, LLC ("ROI Networks, LLC") and that I am authorized to make this certification on behalf of ROI Networks, LLC. I have personal knowledge that ROI Networks, LLC has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to ROI Networks, LLC or to any of the information obtained by ROI Networks, LLC. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures ROI Networks, LLC employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to ROI Networks, LLC or to the information obtained by ROI Networks, LLC.

Signed: \_\_\_\_\_



On behalf of ROI Networks, LLC

Date: \_\_\_\_\_

