

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.), Marco Technologies, LLC ("Marco" or the "Company") files this Statement of Policy outlining the Company's procedures for accessing, using and storing Customer Proprietary Network Information ("CPNI").

Marco provides telecommunications services to enterprise customers. Because Marco may access, use, or store CPNI when providing these 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 Marco 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 Marco to the customer. Except in instances where Marco 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, Marco will first obtain the customer's consent prior to using or sharing CPNI.

Disclosure of CPNI

Marco prohibits the release of CPNI based upon a customer-initiated telephone call only after Marco authenticates the customer. Marco prohibits the release of call detail based on customer-initiated telephone contact unless:

- the customer provides Marco with a pre-established a password;
- When the information requested by the customer is to be sent to the customer's address of record that has been associated with the customer's account for at least 30 days; or
- When Marco calls the telephone number of record (i.e., the telephone number associated with the underlying service).

Online Access to CPNI

If Marco grants online access to CPNI, the Company authenticates a customer without the use of readily available biographical or account information prior to allowing the customer online access to CPNI stored

online. Once authenticated, the customer may only obtain online access to CPNI through a password that is not prompted by the carrier asking for readily available biographical or account information.

Password Authentication Procedures

To establish a password, Marco authenticates the identity of the customer without the use of readily available biographical or account information. The Company may create a back-up customer identification method in the event a customer misplaces or forgets a password, but such alternative customer authentication will not depend on readily available biographical 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.

Account Change Notification

Marco notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.

Disclosure to Business Customers

Marco may negotiate alternative authentication procedures for services that the Company provides to business customers that have a dedicated account representative and a contract that specifically addresses the protection of CPNI.

Employee Training Policies and Disciplinary Procedures

Marco has implemented a CPNI employee training program. Through this training, Marco informs its employees and agents to understand and follow the CPNI rules and that Marco considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important.

Violation by company employees or agents of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, and termination), depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from a supervisor, and the extent to which the violation was or was not deliberate or malicious).

Use of CPNI in Sales and Marketing Campaigns

If Marco uses CPNI in marketing campaigns, the company will maintain a record of all sales 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. Marco will retain records of these campaigns for at least one year.

Marco will also implement a system to obtain prior approval and 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.

Marco 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, Marco has adopted a policy to require all such third parties to enter into a confidentiality agreement that ensures compliance with this Statement of Policy. Marco shall also obtain opt-in consent from a customer prior to disclosing the information to such third parties for marketing purposes. In addition, Marco requires all outside agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.

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

Marco does not market or sell CPNI information to any third party.

Law Enforcement Notification of Unauthorized Disclosure

If an unauthorized disclosure of CPNI occurs, Marco shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").

Marco shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.

Notwithstanding the above, shall not wait the additional seven (7) days to notify its customers if the Company determines there is an immediate risk of irreparable harm to the customers.

Marco employees are required to treat and maintain CPNI as confidential information in accordance with this policy and with Marco's other confidentiality, privacy and security policies. Employees shall contact Marco's General Counsel if they have any questions about this obligation or whether information or its use and disclosure falls under the requirements of this policy.

Employees are instructed that if they suspect that unauthorized access to CPNI has occurred or that this policy may be or has been violated or its protections have otherwise failed, they shall immediately report the matter to the General Counsel or, in her/his absence, to the Chief Financial Officer.

Marco shall maintain records of discovered breaches for a period of at least two (2) years.

Customer Complaints

Marco has not received any customer complaints in the past year concerning the unauthorized release of or access to CPNI.

Contact Information

Individuals or entities that have questions about this CPNI Certification or the use of CPNI by Marco may contact the company's legal counsel, The *CommLaw* Group at (703) 714-1300.

Actions taken against Pretexters

Marco has not taken any actions against data brokers before state commissions, state or federal courts, or the FCC in the past year. Marco has no information, other than information that has been publicly reported, regarding the processes that pretexters are using to attempt to access CPNI.

Annual CPNI Certification

Pursuant to FCC regulations, 47 C.F.R. § 64.2011, Marco will annually submit to the FCC, prior to March 1st, a CPNI Certification of Compliance and accompanying Statement regarding the company's CPNI policies and operating procedures. These documents certify that Marco complied with federal laws and FCC regulations regarding the protection of CPNI throughout the prior calendar year or document any complaints or problems.

Marco Technologies, LLC

Annual CPNI Certification 47 C.F.R. § 64.2009(e) EB Docket No. 06-36

COMPANY NAME: Marco Technologies, LLC
REPORTING PERIOD: January 1, 2015 - December 31, 2015
FILER ID: 830865
OFFICER: Jennifer Mrozek
TITLE: CFO

I, Jennifer Mrozek, hereby certify that I am an officer of Marco Technologies, LLC ("Marco Technologies, LLC") and that I am authorized to make this certification on behalf of Marco Technologies, LLC. I have personal knowledge that Marco Technologies, 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 Marco Technologies, LLC or to any of the information obtained by Marco Technologies, LLC. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Marco Technologies, 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 Marco Technologies, LLC or to the information obtained by Marco Technologies, LLC.

Signed: _____

Jennifer Mrozek, CFO

On behalf of Marco Technologies, LLC

Date: March 24, 2016