Attachment

Protocall, LLC
Statement of CPNI Procedures and Compliance

Protocall, LLC ("Protocall" or "the Company") operates as a payphone provider and inmate service provider, providing "coin in the box" pay telephone service and operator assisted call completion services for transient end users, primarily inmates of confinement facilities.. The Company also offers a prepaid account service for inmates (phone cards) and family and friends of inmates. With the exception of this prepaid account offering, Protocall's services consist of casual traffic provided outside of any subscribed service relationship in which the Company does not have information that relates to the quantity, technical configuration, type, or location of the end use customer's service. The Company does obtain CPNI, including call detail information, with respect to its prepaid account offering. However, it does not use this information for any marketing purposes and strictly prohibits unauthorized use or disclosure of this information.

The Company has processes in place to safeguard call detail information from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to call detail. For operator assisted calls, the called party's local phone company bills collect calls and has its own controls for disclosure and access to this information. For prepaid accounts where the Company manages the account information, the Company has instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Customers are authenticated at the time of service initiation, when the customer's identity is readily authenticated. At that time, at the customer's request, a password is issued, which does not rely upon readily available biographical information or account information. The answers for two security questions are also obtained.

If the customer cannot provide the correct password or if the call comes from a phone number that is not the phone number of the person that set up the account, the customer must set up a new account and the old account remains intact. The Company does not disclose call detail over the telephone in response to a customer-initiated inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative.

During 2016, the Company may initiate an online version of this prepaid account service. If so, we will institute authentication procedures to safeguard the disclosure of CPNI on-line. These procedures will not require the use of readily available biographical information or account information as defined by the FCC. The Company will authenticate customers at the time of service initiation when the customer establishes a password for online access. Passwords will not rely on readily available biographical information or account information. Unless the appropriate password is provided, the Company will not allow on-line access to CPNI. If a customer loses or forgets their password, the customer's identity will be re-authenticated without the use of readily available biographical information or account information. Those re-authenticated will be given a new password.

The Company will immediately notify customers whenever a password, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information.

The Company does not have any retail locations and therefore does not disclose CPNI in-store.

All contracts with correctional facilities specify that call detail is the sole property of the correctional

facility and that the Company must only disclose or allow access to this data by a) authorized correctional facility personnel, b) the paying party for billing purposes, or c) technical support personnel for the purpose of technical and billing support purposes only. Correctional Facility Personnel and Company personnel must have a valid user ID and password in order to access this data at any time. This access authorization is handled on-site by the highest level facility personnel. The administrator at each location will also establish and manage the process for any lost password replacement.

Any other requests for call detail by outside parties are referred to designated management personnel at the correctional facilities whose responsibility it is to release the information to the appropriate legal authorities according to their own procedures. Should the Company ever be required provide call records itself, it would do so only subject to subpoena, and records kept in accordance with the applicable rules.

The Company has procedures in place to notify law enforcement in the event of a breach of the CPNI. There have been no such breaches during 2013, but the Company has a process in place to maintain records of any breaches discovered and to make notifications to the USSS and the FBI in a manner consistent with FCC rules.

The Company did not take any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2015.

The Company has not developed any information with respect to the processes pretexters may use to attempt to access CPNI.