

**Carbon Emery Telcom**

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ANNUAL CERTIFICATE OF COMPLIANCE  
WITH CPNI REGULATIONS

I, Brock E. Johansen, an officer of Emery Telcom, Carbon/Emery Telcom, Inc., and Hanksville Telcom, Inc. (hereinafter "the Companies"), do hereby certify based upon my personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the rules in 47 C.F.R. §§ 64.2001-64.2009. The statement accompanying this certificate explains how the Companies' operating procedures ensure that they are in compliance with those rules.

Officer's signature: \_\_\_\_\_

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

2/2/06

OPERATING PROCEDURES FOR COMPLIANCE  
WITH CPNI REGULATIONS

Every employee of Emery Telcom, Carbon/Emery Telcom, Inc., and Hanksville Telcom, Inc., (the "Companies") has a duty to protect the confidentiality of customer proprietary information ("CPNI"), as defined in 47 U.S.C. § 222(f). A violation of the Companies' operating procedures will result in disciplinary action. For a first violation, an employee will be given a warning and the violation will be noted on the employee's record. An employee will be subject to termination of employment for a second violation.

The service categories provided by the Companies include local exchange telephone service, long distance telephone service, and Internet access service. It is the Companies' policy to not use CPNI for any sales or marketing purpose. Specifically, use of CPNI obtained from the Companies' provision of one service category to market a second service category to individuals or businesses that are not already customers of that second service category is strictly prohibited.

No Company employee shall disclose CPNI to any Company affiliate or other third party unless such disclosure is required by a lawful subpoena or is used for the following purposes: (1) to bill or collect payment for the Companies' services or (2) to protect the rights or property of the Companies or its customers. A Company employee that receives or obtains CPNI for the purpose of providing any telecommunications service shall use such information only for such purpose, and shall not use such information for any marketing purpose.

A Company employee shall disclose CPNI only upon an affirmative request by the customer and only after validating that the person requesting the information is the person that opened the account with the Company. The validation process must, at a minimum, include asking the person requesting CPNI for the last four digits of the customer's social security number and only disclosing the CPNI if the correct four digits are provided. No Company employee shall disclose CPNI to a person other than the customer unless the customer provides

written authorization affirmatively requesting that the customer's CPNI be disclosed to that person.

The Companies keep a record of all instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to CPNI (hereinafter referred to as "the CPNI record"). An employee that discloses CPNI to a third party or allows a third party access to CPNI must add to the CPNI record the name and address of the third party, a description of the reasons for the disclosure of the CPNI, the specific CPNI that was disclosed, and any written authorization from the customer to disclose the CPNI. This record is maintained by the Companies for a minimum period of one year.

The Companies hold training sessions regularly to train employees as to when they are and are not authorized to use or disclose CPNI. Employee attendance at these training sessions is mandatory.

Should the Companies make a decision to modify its prohibition on the use of CPNI for marketing purposes, it will notify all employees of any such modifications. Under no circumstances will CPNI be used for any marketing purpose until after the Companies have sent customers the notices required by 47 C.F.R. § 64.2008 and received the customer opt-in or opt-out approvals required for such use of CPNI. Sales personnel must obtain written supervisory approval before soliciting customer approval for any out-bound marketing campaign. The Companies will establish a system by which the status of a customer's CPNI approval can be clearly established if the Companies change their current policy and decides to use CPNI in an out-bound sales or marketing campaign. Upon such a change in the Companies policy, employees must add to the CPNI record a description of each such out-bound marketing campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.