

## OPERATING PROCEDURES FOR COMPLIANCE WITH CPNI RULES

Laurens Municipal Power & Communications (the "Company") has implemented the following procedures to ensure that it is compliant with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Network Information (CPNI), § 64.2001 through § 64.2011.

### Compliance Officer

The Company has appointed a CPNI Compliance Officer. The Compliance Officer is responsible for ensuring that the Company is in compliance with all of the CPNI rules. The Compliance Officer is also the point of contact for anyone (internally or externally) with questions about CPNI.

### Employee Training:

The Compliance Officer arranges for the training of all employees on an annual basis, and more frequently as needed. Any new employee is trained when hired by the Company. The training includes, but is not limited to, when employees are and are not authorized to use CPNI, and the authentication methods the company is using. The detail of the training can differ based on whether or not the employee has access to CPNI.

After the training, all employees are required to sign a certification that they have received training on the CPNI rules, that they understand the Company's procedures for protecting CPNI and they understand the Company's disciplinary process for improper use of CPNI. Each employee of Laurens Municipal Power & Communications has their own CPNI manual.

Employees are instructed that if they ever have any questions regarding the use of CPNI, or if they are aware of CPNI being used improperly by anyone, they should contact the Compliance Officer immediately.

### Disciplinary Process

The Company has established a specific disciplinary process for improper use of CPNI. The disciplinary action is based on the type and severity of the violation and could include any or a combination of the following: retraining the employee on CPNI rules, notation in the employee's personnel file, formal written reprimand, suspension or termination.

The disciplinary process is reviewed with all employees.

A copy of the Company's disciplinary process is kept in the CPNI manual.

### Customer Notification and Request for Approval to Use CPNI

The Company has not provided notification to its customers and has not asked for approval to use CPNI because it only uses CPNI in those instances where it is permissible to use CPNI without customer approval. It does not share the customer's CPNI with any joint venture partner, independent contractor or any other third party. For marketing purposes, the Company does mass marketing to all customers, or uses CPNI to market only service offerings among the categories of service to which the customer already subscribes.

If the Company receives a call from a customer who wants to discuss services outside of the customer's existing service offerings, the customer service representative uses the oral notification for one-time use of CPNI to obtain approval for the duration of the call only.

### Marketing Campaigns

If the Company uses CPNI for any marketing campaign, the Compliance Officer will review the campaign and all materials to ensure that it is in compliance with the CPNI rules.

The Company has a process for maintaining a record of any marketing campaign of its own, or its affiliates, which uses customers' CPNI.

### Authentication

The Company does not disclose any CPNI until the customer has been appropriately authenticated as follows:

In-office visit - the customer must provide a valid photo ID matching the customer's account information.

Customer-initiated call – the customer must provide his/her pre-established password and must be listed as a contact on the account. If the customer cannot provide the password or the answer to the back-up authentication, the customer is re-authenticated, without using readily available biographical information or account information, and a new password is established.

### Notification of Account Changes

The Company promptly notifies customers whenever a change is made to any of the following:

- Password.
- Customer response to a back-up means of authentication for a password.
- Address of record.

The notification to the customer will be made either by a Company-originated voicemail to the telephone number of record or sent to the address (postal or electronic) of record.

The Company has a process for tracking when a notification is required and for recording when and how the notification is made. Our billing system generates the notification letter automatically.

### Notification of Breaches

Employees will immediately notify the Compliance Officer of any indication of a breach. If it is determined that a breach has occurred, the Compliance Officer will do the following:

- Notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) as soon as practicable, but in no event later than 7 business days after determination of the breach. The notification will be via the FCC link at <http://www.fcc.gov/eb/cpni>.
- Notify customers only after 7 full business days have passed since notification to the USSS and the FBI, unless the USSS or FBI has requested an extension.
- If there is an urgent need to notify affected customers or the public sooner to avoid immediate and irreparable harm, it will be done only after consultation with the relevant investigating agency.
- Maintain a record of the breach, the notifications made to the USSS and FBI, and the notifications made to customers. The record should include dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.
- Include a summary of the breach in the annual compliance certificate filed with the FCC.

### Annual Certification

The Compliance Officer will file a Compliance Certification with the FCC by March 1 of each year, for data pertaining to the previous calendar year.

## Record Retention

The Company retains all information regarding CPNI in a CPNI file located in the Compliance Officer's office. Following is the minimum retention period we have established for specific items:

- CPNI notification and records of approval – two years
- Marketing campaigns – two years
- Breaches – two years
- Annual certification – five years
- Employee training certification – two years
- All other information – two years