

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

Date Filed: September 19, 2008

Name of Company

Covered by this Certification: Quasar Communications, Inc.

Name of Signatory: Elise Escamilla

I, Elise Escamilla, certify that I am an officer of Quasar Communications, Inc. ("Quasar"). I attest that, as an officer of Quasar, I am authorized to execute this CPNI Compliance Certification on the company's behalf.

I have personal knowledge that Quasar's business methods and the procedures adopted and employed by Signal are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("the Act"), and the Federal Communications Commission's regulations implementing Section 222 of the Act, 47 C.F.R. § 64.2005, 64.2007 and 64.2009.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. The company has no information to report with respect to the processes pretexters are using to attempt to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: *Elise Escamilla*
Elise Escamilla

**STATEMENT OF POLICY IN TREATMENT OF
CUSTOMER PROPRIETARY NETWORK INFORMATION**

1. It is the policy of Quasar Communications Corporation ("Company") to not to use CPNI for any activity other than permitted by 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 the Company to the customer. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the Company will first obtain the customer's consent prior to using CPNI.
2. Company follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or Company. However, Company cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:
 - A. If an unauthorized disclosure were to occur, Company shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").
 - B. Company shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
 - C. Notwithstanding the provisions in subparagraph B above, Company shall not wait the additional seven (7) days to notify its customers if Company determines there is an immediate risk of irreparable harm to the customers.
 - D. Company shall maintain records of discovered breaches for a period of at least two (2) years.
3. All employees will be trained as to when they are, and are not, authorized to use CPNI upon employment with the Company and annually thereafter.
 - A. Specifically, Company shall prohibits its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances.
 1. When the customer has pre-established a password;
 2. When the information requested by the customer is to be sent to the customer's address of record; or
 3. When Company calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated.

B. Company may use CPNI for the following purposes:

- To initiate, render, maintain, repair, bill and collect for services;
 - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscriptions to, such services;
 - To provide inbound telemarketing, referral or administrative services to the customer during a customer-initiated call and with the customer's informed consent;
 - To market additional services to customers that are within the same categories of service to which the customer already subscribes;
 - To market services formerly known as adjunct-to-basic services; and
 - To market additional services to customers with the receipt of informed consent via the use of opt-in or opt-out, as applicable.
4. Prior to allowing access to customers' individually identifiable CPNI to Company's joint venturers or independent contractors, Company will require, in order to safeguard that information, their entry into both confidentiality agreements that ensure compliance with this Statement and shall obtain opt-in consent for a customer prior to disclosing the information. In addition, Company requires all outside Dealers and Agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.
5. Company requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.
6. Company does not market, share or otherwise sell CPNI information to any third party.
7. Company maintains a record of its own and its affiliates' sales and marketing campaigns that use Company's customers' 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.

A. Prior to commencement of a sales or marketing campaign that utilizes CPNI, Company establishes the status of a customer's CPNI approval. The following sets forth the procedure followed by Company.

- Prior to any solicitation for customer approval, Company will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
- Company 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.

- Company provides individual notice to customers when soliciting approval to use, disclose or permit access to CPNI.
 - The content of Company's CPNI notices comply with FCC Rule 64.2008(c).
8. Company has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.
 9. Company has 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. Specifically, Company's sales personnel will obtain express approval of any proposed outbound marketing request for customer approval of the use of CPNI by the General Counsel of Company.
 10. Company notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
 11. Company may negotiate alternative authentication procedures for services that Company provides to business customers that have a dedicated account representative and a contract that specifically addresses Company's protection of CPNI.
 12. 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.