

February 27, 2009

Name of company covered by this filing: PRO COMM INC

FCC Registration Number: 0002758241

Box 462

Mt. Pleasant, MI 48858

Statement

Pro Comm Inc. has established operating procedures that ensure compliance with the Federal Communication Commission regulations regarding the protection of customer proprietary network information (CPNI)

- Pro Comm Inc. has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Pro Comm Inc. continually educates and trains its employees regarding the appropriate use of CPNI. And has established disciplinary procedures should an employee violate the CPNI procedures established by Pro Comm Inc.
- Pro Comm Inc. maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Pro Comm Inc. also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Pro Comm Inc. has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains record of carrier compliance for a minimum period of one year. Specifically, Pro Comm Inc. sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Pro Comm Inc. to the following actions against data brokers in 2007, including proceedings or petitions filed by Pro Comm Inc. at a state commission, in the court system, or at the FCC: **NONE**

- The following is information Pro Comm Inc. has with respect to the processes pretexters are using to attempt to access CPNI, and (in any) what steps carriers are taking to protect CPNI: **Pro Comm Inc. has determined that no pretexter has attempted to access CPNI on Pro Comm Inc.'s system.**

- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release fo CPNI: **NONE**

Category of Complaint:

0.....Number of instances of improper access by employees

0.....Number of instances of improper disclosure to individuals not authorized to receive the information

0.....Number of instances of improper access to online information by individual not Authorized to view the information

0.....Number of other instances of improper access or disclosure

Description of instances of improper access or disclosure: **NONE**

Signed: Harold W. Stegman, President