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February 1, 2010

### **STATEMENT**

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

- Carrier has implemented a system whereby the status of a customer’s CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates’ sales and marketing campaigns that use its customers’ CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed 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.
- Carrier has established a supervisory review process regarding compliance with eht CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier’s 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.
- Carrier took the following actions against data brokers in 2009, including proceedings instituted or petitions filed by Carrier at a stat commission, in the court system, or at the Federal Communications Commission: **NONE**
- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and (if any) what steps carriers are taking to protect CPNI: **“Carrier has determined that no pretexter has attempted to access CPNI on Carrier’s system.”**

- The following is a summary of all customer complaints received in 2009 regarding the unauthorized release of CPNI:

Number of customer complaints Carrier Received in 2009 related to unauthorized access to CPNI, or unauthorized disclosure of 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 individuals not authorized to view information

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