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January 27, 2010

Marlene H. Dortch
Commission's Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, DC 20554

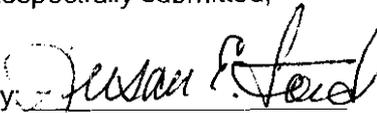
Re: EB Docket No. 06-36 (CPNI Certification 2009)

Dear Ms. Dortch:

On behalf of Broadstripe, LLC (f/k/a Millennium Digital Media Systems, L.L.C.) ("Broadstripe"), I attach the 2009 Annual Customer Proprietary Network Information (CPNI) Certification. We enclose an original and 4 copies, per the instructions.

Please call me at (636) 534-7459 with any questions. Thank you.

Respectfully submitted,

By: 

Susan E. Ford
Paralegal & Assistant Secretary

Enclosures

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009

Date filed: January 19, 2010

Name of company covered by this certification: Broadstripe, LLC f/k/a Millennium Digital Media Systems, L.L.C.

Form 499 Filer ID: **825938**

Name of signatory: Debra S. Wood

Title of signatory: Executive Vice President - Finance Operations

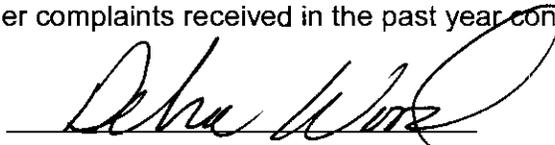
I, Debra S. Wood, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules [attach accompanying statement].

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) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information). If affirmative: [Provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.]

Signed



BROADSTRIPE, LCC (“BROADSTRIPE”) CPNI OPERATING PROCEDURES

Prepared by

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INTRODUCTION

Federal law and FCC regulations require that telecommunications carriers limit use, disclosure, and access to Customer Proprietary Network Information (“CPNI”).

The FCC recently revised the definition of “telecommunications carrier” to include interconnected VoIP providers for the purposes of the CPNI rules.

There are two main concerns behind the CPNI law and regulations:

- **To prevent the disclosure of CPNI to “pretexters.”** To thwart pretexters, FCC regulations specify detailed customer authentication procedures that a carrier must follow before disclosing CPNI to a person claiming to be the customer.
- **To prevent the use of CPNI for unauthorized marketing purposes.** To this end, federal law and regulations prohibit use, disclosure, and access to CPNI without customer consent for certain marketing purposes.

Compliance with these rules is critical: The FCC has stated that “there may be no more important obligation on a carrier’s part than protection of its subscribers’ proprietary information,” and requires carriers to establish operating procedures adequate to ensure compliance with the CPNI regulations. The FCC has extracted six-figure payments from carriers for their failure to comply with the regulations, including for mere recordkeeping violations such as the failure to execute an annual compliance certificate.

We have prepared a checklist of CPNI Operating Procedures to assist Broadstripe in dealing with CPNI under federal law and the FCC’s regulations.

BROADSTRIPE'S CPNI OPERATING PROCEDURES

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGES</u>
I. Policy	1
II. Definitions	1-2
III. Checklist of general operating procedures	
A. CPNI Compliance Supervisor	2
B. Safeguarding CPNI from unauthorized disclosure	3-4
C. Use of CPNI by Broadstripe: When is customer approval needed?	5
D. Soliciting customer approval – customer notification	6
E. Using CPNI for marketing campaigns	
1. General procedures	7
2. Obtaining opt-out approval (for marketing communications-related services)	7-8
3. Obtaining opt-in approval	8-9
F. Uses of CPNI that do not require customer approval	10
G. Training and disciplinary procedures	10
H. Filing, notice and recordkeeping requirements	10-12
Appendices	11-20

I. POLICY

It is the policy of Broadstripe to comply with the laws and regulations applicable to CPNI, and to ensure that CPNI be kept confidential, except for such use, disclosure and access to CPNI as is permitted by 47 USC § 222 and the FCC's CPNI rules (47 CFR §§ 64.2001 – 64.2011). Accordingly, Broadstripe has instituted these CPNI Operating Procedures.

The CPNI Compliance Supervisor identified in Section III.A below shall be responsible for the implementation of these CPNI Operating Procedures.

II. DEFINITIONS

Below are the definitions applicable to Broadstripe's CPNI Operating Procedures. Note that when a defined term appears in these Operating Procedures, it is generally highlighted in bold type for ease of reference.

Account information. Information that is specifically connected to the customer's service relationship with the carrier, including any component of an account number, the telephone number associated with the account, or the amount of a bill.

Address of record. A postal or electronic address that the carrier has associated with the customer's account for at least 30 days.

Breach. When a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI.

Call detail information. Any information that pertains to the transmission of specific telephone calls, including:

- For outbound calls, the number called, and the time, location, or duration of any call.
- For inbound calls, the number from which the call was placed, and the time, location or duration of any call.

Communications-related services. Telecommunications services, information services typically provided by telecommunications carriers (such as Internet access or voice mail services), and services related to the provision or maintenance of customer premises equipment. This definition does not include cable television services.

CPNI. In short, CPNI is information on the types of service to which the

customer subscribes, and the customer's call detail information.¹ The legal definition is:

- “(A) information that relates to the quantity, technical configuration, type destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and
- (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier;

except that such term does not include subscriber list information.”

Customer. A person or entity to whom the telecommunications carrier is currently providing service.

Opt-in approval. Affirmative, express consent from a customer allowing CPNI usage, disclosure or access after the customer is provided with notification of the carrier's request for the use, disclosure or access in accordance with the FCC's rules.

Opt-out approval. Implied consent to the use, disclosure of, or access to CPNI after the customer fails to object following notification of the carrier's request for the use, disclosure or access to CPNI in accordance with the FCC's rules.

Readily available biographical information. Information drawn from the customer's life history, including social security number (or the last four digits of the SSN), mother's maiden name, home address or date of birth.

Subscriber list information. Subscriber names, addresses, telephone numbers, and primary advertising classifications that the carrier has published or has accepted for publication in a directory.

Telephone number of record. The telephone number associated with the underlying service, not the telephone number supplied as a customer's contact information.

Valid photo ID. An unexpired, government-issued means of personal identification with a photograph, such as a driver's license, passport or comparable ID.

III. CHECKLIST OF GENERAL OPERATING PROCEDURES

A. CPNI Compliance Supervisor

¹ Note that aggregate customer information (information from which individually identifiable information has been removed) and subscriber list information (listed name, address and telephone number information) are not CPNI, and are not subject to the FCC's CPNI regulations.

- [] Broadstripe shall have at all times a CPNI Compliance Supervisor to supervise the implementation of Broadstripe's CPNI Operating Procedures. The current CPNI Compliance Supervisor is:

Name: **NEED TO DETERMINE WHO THE COMPLIANCE SUPERVISOR IS.**

Phone Number:

Fax:

Email:

B. Safeguarding CPNI from unauthorized disclosure

- [] Broadstripe shall take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI.
- [] CSRs shall properly authenticate a customer's identity using the procedures below prior to disclosing CPNI based on customer-initiated telephone calls, online account access, or an in-store visit.

1. Customer-initiated telephone calls – identity authentication procedures

Customer wants call detail information	Customer wants non-call detail information (example: minutes of use)
<ul style="list-style-type: none"> • Customer must provide password not prompted by carrier asking for readily-available biographical information or account information; or • CSR may send requested information to address of record; or • CSR may call customer at telephone number of record to discuss information; or • If customer can provide call detail information without CSR assistance, CSR may discuss that specific call detail information. 	<ul style="list-style-type: none"> • CSR must authenticate customer, and may use readily available biographical information or account information.

2. Online access – identity authentication procedures

- [] Broadstripe shall authenticate the identity of a customer without the use of **readily available biographical information** or **account information** prior to allowing online access to CPNI.
- [] Broadstripe shall request that the customer establish a password at the time the customer establishes his/her account.
- [] Broadstripe shall request that the customer establish a “shared secret” at the time the customer establishes his/her account.²
- [] Once a customer is authenticated, Broadstripe shall allow the customer online access to CPNI only through a password that is not prompted by Broadstripe asking for **readily available biographical information** or **account information**.

3. In-person access to CPNI – identity authentication procedures.

- [] Personnel may only disclose CPNI to a customer at a retail location if the customer presents a valid photo ID.

4. Business customers.

Broadstripe may provide different authentication procedures for business customers if:

- [] Broadstripe provides a dedicated account representative for the customer; and
- [] The contract with the customer specifically addresses Broadstripe’s protection of CPNI.

5. Lost or forgotten passwords

- [] For a customer who has lost or forgotten his/her password, Broadstripe shall authenticate the customer’s identity before providing the password without using **readily available biographical information** or **account information**. Instead, Broadstripe shall use one of the following methods to authenticate the customer:

- [] “Shared secret” authentication.

² In this method, the carrier asks the customer to respond to a question the answer to which is not widely known. For example: “What was the name of your first pet?” or “In which city was your mother born?”

- [] Call the customer at the **telephone number of record**.
- [] Forward a PIN to the customer via voicemail or text message to the **telephone number of record**, or by mailing it to the **address of record**.
- [] Review **valid photo ID** presented at Broadstripe's retail location.

C. Use of CPNI by Broadstripe: When is customer approval needed?

There are a number of reasons that Broadstripe would use a customer's CPNI: To provide the customer's VoIP services, to bill and collect for the VoIP services, and to target-market additional services. The FCC's regulations allow Broadstripe to use CPNI without customer approval for some of these activities. For others, the FCC requires either "**Opt-out approval**" or "**opt-in approval.**" The chart below provides a quick reference for when customer approval is and is not required.

No customer approval required	Opt-out approval required	Opt-in approval required
Initiating, rendering, billing and collecting for the customer's Broadstripe Voice services.	Marketing communications-related services , such as Internet access services.	<u>All other uses of CPNI</u> , including marketing Broadstripe's cable television services.
Marketing service offerings among the categories of service (the FCC lists "local, interexchange and CMRS" as examples of categories of service) to which the customer already subscribes.	Disclosure of and access to CPNI by agents and any affiliates that provide communications-related services so that they can market those services.	
If the customer subscribes to more than one category of a Broadstripe's service (i.e., local and interexchange), Broadstripe may share CPNI with an affiliated entity if the affiliated entity provides a service offering to the customer.		
Providing inside wiring installation, maintenance, and repair services.		
Marketing adjunct-to-basic services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call tracking, call waiting, caller ID, call forwarding, etc.		

Protecting Broadstripe's rights or property, or protecting users of Broadstripe Voice services and other carriers from fraudulent, abusive, or unlawful use of/subscription to, the services.

The following section provides the procedures that Broadstripe must follow to solicit **opt-out approval** and **opt-in approval**.

D. Soliciting customer approval - customer notification

Before obtaining customer approval for use, disclosure or access to CPNI, Broadstripe shall provide customers with a notification regarding their CPNI rights.

- [] At the time of initiating service and on its website, Broadstripe shall provide customers with notification of their right to restrict the use, disclosure of, and access to their CPNI.
- [] The notification shall provide enough information so that customers can make an informed decision on whether to permit Broadstripe to use their CPNI.
- [] The notification shall legible, in sufficiently large type, and placed in an area so as to be readily apparent to the customer.
- [] The notification shall be comprehensible, non-misleading, and contain the following:
 - [] A statement that the customer has the right, and that Broadstripe has a duty under federal law to protect the confidentiality of CPNI.
 - [] A list of the types of information that constitute CPNI.
 - [] A list of the entities that will receive the CPNI.
 - [] A description of how the CPNI will be used.
 - [] A statement informing the customer of his/her right to disapprove the uses and to deny or withdraw access to the CPNI at any time.
 - [] A description of the precise steps the customer must take to grant or deny access to CPNI.
 - [] A statement that any approval or denial for the use of CPNI outside of the service to which the customer already subscribes is valid until the customer affirmatively revokes or limits it.
 - [] A statement that denial of approval will not affect the provision of any services to the customer, but Broadstripe can include clear and neutral language describing consequences directly resulting from lack of access to CPNI.
 - [] The notification shall not include a statement attempting to encourage a customer to freeze third-party access to CPNI.
 - [] The solicitation for approval must be proximate to (e.g., in the same document or mailing) the notification of the customer's CPNI rights.

E. A model customer notification is attached as Appendix 1.

Using CPNI for marketing campaigns

As shown in the chart in Section III.C, in some cases Broadstripe will need to have customer approval before using a customer's CPNI for an outbound marketing campaign. The subsections below contain the general procedures to be followed before using, disclosing or allowing access to CPNI for outbound marketing campaigns.

1. General procedures

- [] Broadstripe's CPNI Compliance Supervisor shall implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use, disclosure or access to CPNI for a marketing campaign. By way of example, the electronic records for customer accounts might have a checkbox for "opt-out approval," "opt-in approval," or "approval denied."
- [] A customer's approval or disapproval to use, disclose or permit access to his/her CPNI shall remain in effect until the customer revokes or limits such approval or disapproval.
- [] Sales personnel must obtain the CPNI Compliance Supervisor's approval for any proposed outbound marketing campaigns.
 - [] The CPNI Compliance Supervisor shall review any outbound marketing campaigns for compliance with these Operating Procedures, and shall determine if **opt-out approval** or **opt-in approval** is required.
 - [] The CPNI Compliance Supervisor shall maintain records of this process for at least one year.
- [] Broadstripe's CPNI Compliance Supervisor shall maintain a record of Broadstripe's and any affiliate's sales and marketing campaigns using CPNI.
- [] Broadstripe's CPNI Compliance Supervisor shall maintain for at least one year a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record shall include:
 - [] A description of each campaign;
 - [] The specific CPNI used in each campaign; and
 - [] The products or services offered as part of the campaign.

2. Obtaining opt-out approval (for marketing communications-related services)

Opt-out approval means that the customer is deemed to have consented to the use, disclosure or access to his/her CPNI unless s/he objects within a 30-day waiting period following the solicitation of that approval. Broadstripe will need **opt-out approval** to use a customer's CPNI for the following:

- Marketing **communications-related services** to that customer;
- Disclosing and allowing access to the customers' CPNI by Broadstripe's agents and affiliates that provide **communications-related services** to market **communications-related services** to the customer.

Opt-out approval is generally obtained by providing a customer a written opt-out notification at the initiation of service either in writing or electronically (**opt-out approval cannot** be oral). If Broadstripe uses the **opt-out approval** mechanism, it must provide opt-out notices to its customers every two years.

Section 4 of the customer notification attached as Appendix 1 contains an **opt-out approval** notification.

Below are the procedures that Broadstripe must follow to obtain **opt-out approval**:

- Provide **opt-out approval** notification through email³ or written means.
- Wait at least 30 days after providing the notification before assuming approval to use, disclose or give access to CPNI.⁴
- Notify customers of the applicable waiting period for a response before approval is assumed.
- Provide opt-out notices to customers every two years.

3. Obtaining opt-in approval

³ Note that there are additional requirements if the notices are delivered via email:

- Broadstripe must obtain express, verifiable, prior approval from a consumer to send notices via email regarding their services in general, or CPNI in particular;
- Broadstripe must allow customers to reply directly to emails containing CPNI notices in order to opt-out;
- Broadstripe cannot obtain **opt-out approval** from an email notice that is returned as undeliverable;
- The subject line of the email must clearly and accurately identify the subject matter; and
- Broadstripe must make available a method to opt-out that is of no additional cost and is available 24x7.

⁴ If the notification is electronic, the waiting period runs from the date on which the notification was sent. If the notification is by mail, the waiting period begins to run on the third day following the date that the notification was mailed.

Broadstripe must obtain **opt-in approval** for any use of CPNI not listed in Subsections III.E.2 above, or III.F below. With **opt-in approval**, the customer must give affirmative, express consent to use, disclosure, or access to his/her CPNI. With **opt-in approval**, Broadstripe can use or disclose the customer's CPNI for any purpose that is detailed in the accompanying notification, including marketing Broadstripe's cable television services.

Opt-in approval may be obtained through oral, written or electronic means. Section 5 of the customer notification attached as Appendix 1 contains an **opt-in approval** notification.

Broadstripe may also obtain oral, "one-time" **opt-in approval** on an inbound or outbound customer telephone call through an opt-in notification. The procedures for obtaining oral, one-time **opt-in approval** are listed below.

- [] Broadstripe shall provide the customer with the following information on the inbound or outbound telephone call:
 - [] A statement that the customer has a right, and that Broadstripe has a duty under federal law to protect the confidentiality of the customer's CPNI.
 - [] A list of the types of information that constitute CPNI.
 - [] A description of how the customer's CPNI will be used.
 - [] A list of the entities that will receive the CPNI, unless the limited usage will not result in access or disclosure to CPNI by an affiliate or third party.
 - [] An explanation that the customer can deny access to his/her CPNI for the call.
 - [] An explanation that the scope of the approval is limited to one-time use for the duration of the call.
 - [] A statement that denial of approval will not affect the provision of any services to the customer, but Broadstripe can include clear and neutral language describing the consequences directly resulting from lack of access to the CPNI.
 - [] An explanation that the customer can deny or withdraw access to his/her CPNI at any time.
 - [] A statement that any approval or denial for the use of CPNI outside of the service to which the customer already subscribes from Broadstripe is valid until the customer affirmatively revokes or limits

the approval or denial.

Broadstripe shall not include a statement attempting to encourage a customer to freeze third-party access to CPNI.

Broadstripe's CSRs shall make a notation on the customer's account records of the approval or denial.

F.

Uses of CPNI that do not require customer approval.

Under federal law and the FCC's CPNI regulations, there are certain purposes for which a carrier does not need customer approval to use CPNI. The rationale for these exclusions from the general rule is that these purposes are within the established carrier-customer relationship, and the customer has therefore given implied consent for the use or disclosure of CPNI for these purposes. Broadstripe can use CPNI without customer approval for the following purposes:

- Initiating, rendering, billing and collecting for the Broadstripe Voice services;
- Marketing the Broadstripe Voice service offerings to customers;
- Providing inside wiring installation, maintenance, and repair services.
- Marketing adjunct-to-basic services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, and call forwarding.
- Protecting Broadstripe's rights or property, or protecting users of the Broadstripe Voice services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

All other uses of CPNI require notice and opt-out or opt-in consent as described in Subsections III.E.2 and III.E.3 above.

G. Training and disciplinary procedures

Broadstripe must provide CPNI training to its personnel to ensure compliance with the FCC's CPNI regulations:

- Broadstripe shall train its personnel as to when they are and are not authorized to use CPNI.
- Broadstripe shall implement an express disciplinary process for misuse of CPNI (a model disciplinary policy is attached as Appendix 2).

H. Filing, notice and recordkeeping requirements

1. Filing requirements

- The CPNI Compliance Supervisor shall have an officer sign and shall file with the FCC a compliance certificate each March 1st in EB Docket No. 06-36.

- The certificate shall contain a statement that the officer has personal knowledge that Broadstripe has established operating procedures that are adequate to ensure compliance with the CPNI rules.
- The CPNI Compliance Supervisor shall include with the certificate a statement explaining how Broadstripe's operating procedures ensure that Broadstripe is in compliance with the CPNI rules.
- The CPNI Compliance Supervisor shall include with the certificate an explanation of any action taken against data brokers.
- The CPNI Compliance Supervisor shall include with the certificate a summary of all customer complaints received in the past year based on unauthorized release of CPNI.

A model compliance certificate and the required attachments are attached as Appendix 3.

2. Notice requirements

Customer notifications

- Except upon initiation of service, Broadstripe shall immediately notify a customer whenever the following are created or changed:
 - A password
 - Customer response to a back-up means of authentication for lost or forgotten passwords
 - Online account
 - Address of record
- The notification shall be made through a carrier-originated voicemail or text message to the **telephone number of record**, or by mail to the **address of record**. The notification shall not be sent to the new account information.
- The notification shall not reveal the changed information.
- Broadstripe shall provide a CPNI notification at the initiation of service and on its website.
- If Broadstripe uses **opt-out approval**, Broadstripe shall provide an **opt-out approval** notification to customers every 2 years.

Notifications to federal agencies

The CPNI Compliance Supervisor shall provide written notice to the FCC within 5 business days of any instance where the opt-out mechanisms do not work properly if the problem is more than an anomaly. The notice shall be in the form of a letter and include:

- Broadstripe's name and d/b/a;
- A description of the opt-out mechanism used;
- A description of the problem;
- The proposed remedy and when it will be implemented;
- Whether the appropriate state PUC has been notified and whether it has taken any action;
- A copy of the notice provided to customers; and
- Contact information for the CPNI Compliance Supervisor.

In the event of a **breach** of a customer's CPNI, the CPNI Compliance supervisor shall provide notice to the Secret Service and FBI as detailed in Section IV below.

3. Recordkeeping requirements

The CPNI Compliance Supervisor shall maintain the following records related to marketing campaigns for at least one year.

A record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record shall include:

- A description of each campaign;
- The specific CPNI used in each campaign; and
- The products or services offered as part of the campaign.

Records of the CPNI Compliance Supervisor's approval of any proposed outbound marketing campaigns.

Records of customer notifications and customer approvals (whether oral, written or electronic).

Broadstripe shall maintain for two years a record of any **breaches** discovered, notifications made to the Secret Service and FBI pursuant to Section IV of these CPNI Operating Procedures, and notifications made to customers. The record may be electronic and must include, if available:

- The dates of discovery and notification;
- A detailed description of the CPNI that was the subject of the **breach**; and
- The circumstances of the **breach**.

IV. SECURITY BREACHES

The FCC's regulations contain detailed procedures that Broadstripe must follow in the event of a **breach** of a customer's CPNI:

- [] Broadstripe shall notify the Secret Service and FBI of a **breach** of its customers' CPNI as provided below.
- [] Broadstripe shall not notify its customers of a **breach** or disclose the **breach** publicly, whether voluntarily, under state or local law, or under the FCC's regulations, until it has completed the process of notifying the Secret Service and FBI as provided below.
 - [] As soon as practicable, and in all cases within 7 business days after discovering the **breach**, Broadstripe shall electronically notify the Secret Service and the FBI through a central reporting facility at <http://www.fcc.gov/eb/cpni>.
 - [] Broadstripe shall wait 7 full business days after it notifies the Secret Service and FBI of a **breach** before notifying customers or disclosing the **breach** to the public. After that time, Broadstripe shall notify its customers of a **breach** of their CPNI (and may disclose the **breach** to the public) unless:
 - [] The relevant agency directs Broadstripe not to disclose or notify its customers of the breach. In such case Broadstripe shall not do so until it is notified in writing by the agency that it may notify its customers or disclose the **breach** publicly.
 - [] If Broadstripe believes there is an extraordinarily urgent need to notify any class of customers sooner to avoid immediate and irreparable harm, Broadstripe shall so indicate in its notification to the Secret Service and FBI, and may notify its customers only after consultation with the relevant agency. Broadstripe shall cooperate with the relevant agency's request to minimize any adverse effects of customer notification.

APPENDIX 1

Broadstripe Notification Regarding CPNI Policy

This CPNI Policy applies to the customer proprietary network information ("CPNI") of subscribers to Millennium Digital Media, L.L.C.'s ("Broadstripe," "we," "us") Broadstripe Voice services ("Broadstripe Voice").

1. Introduction

CPNI. Customer proprietary network information, or CPNI, is information about the quantity, technical configuration, type, destination, location, and amount of your use of the Broadstripe Voice services; and information contained on your bills related to the Broadstripe Voice services that you receive.

CPNI does not include your name, address, and telephone number, because federal law classifies that information as "subscriber list information" which is not subject to the protections applicable to CPNI. However, that information may be subject to protection as personally identifiable information under Broadstripe's privacy policy. Please see Broadstripe's privacy policy for more information.

Federal Law. 47 U.S.C. § 222 provides privacy protections for certain information related to the Broadstripe Voice services. This CPNI Policy describes what CPNI we obtain, how we protect it, and how it may be used.

Your Rights. Customers of the Broadstripe Voice services have the right under federal law, and Broadstripe has a duty under federal law, to protect the confidentiality of their CPNI. Broadstripe will also honor any restrictions applied by state law, to the extent applicable.

2. Use, Disclosure and Access to CPNI

47 U.S.C. § 222 and FCC regulations authorize us to use, disclose, or permit access to CPNI without your approval for the purposes of:

- Initiating, rendering, billing, and collecting for your Broadstripe Voice services;
- Marketing Broadstripe Voice service offerings to you;
- The provision of inside wiring installation, maintenance, and repair services.
- To market adjunct-to-basic services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, and call forwarding.
- To provide any inbound telemarketing, referral, or administrative services to you for the duration of the call, if such call was initiated by you and you approve of the use of such information to provide such service.

- To protect our rights or property, or to protect users of our services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

Federal law and FCC regulations prohibit us from using CPNI for any purposes other than those listed above except as explained in Sections 4 and 5 below, at your affirmative written request, or as permitted or required by law.

4. Marketing of Communications-Related Services

Broadstripe may use your CPNI and disclose to and allow access to your CPNI by its agents and any affiliates that provide communications-related services to market communications-related services (such as Internet services and services related to the provision or maintenance of customer premises equipment) to you unless you contact us to deny or restrict your approval. **IF BROADSTRIPE DOES NOT HEAR FROM YOU WITHIN 30 DAYS AFTER PROVIDING YOU THIS NOTIFICATION, BROADSTRIPE WILL ASSUME THAT YOU APPROVE OUR USE OR DISCLOSURE OF YOUR CPNI TO MARKET COMMUNICATIONS-RELATED SERVICES. IF YOU APPROVE, YOU DO NOT HAVE TO TAKE ANY ACTION.** Please note that you may deny or restrict your approval at any time as provided in Section 6 below.

5. Other Services

Broadstripe also offers other services that are not related to the Broadstripe Voice services to which you subscribe. Under the FCC's CPNI regulations, some of those services, such as Broadstripe's cable television services, are considered to be non-communications related products and services. Occasionally, you may be asked by Broadstripe or one of its agents during a call regarding your Broadstripe Voice services for your oral consent to Broadstripe's use of your CPNI for the purpose of providing you with an offer for non-communications related products and services. If you provide your oral consent for Broadstripe to do so, Broadstripe may use your CPNI only for the duration of that call in order to offer you additional services.

6. To Grant, or to Deny or Restrict Approval, of Use, Disclosure and Access to CPNI

You may grant us approval to use, disclose and access your CPNI, or may deny or restrict your approval at any time. To do so, please see our contact information in Section 9 below. Any approval or denial of approval for the use of your CPNI outside of the service to which you already subscribe is valid until you affirmatively revoke or limit such approval or denial. A denial of approval will not affect the provision of any services to which you subscribe, but with your approval, Broadstripe and its agents and affiliates can use your CPNI to offer you additional products and services that will better serve your needs, or package deals or special promotions that may save you money.

You do not have to take any action if you have previously contacted us in response to a CPNI notification and denied use of your CPNI for the purposes described above.

6. Requests for CPNI.

If you request a copy of your CPNI in writing and we reasonably believe the request is

CPNI notification and denied use of your CPNI for the purposes described above.

6. Requests for CPNI.

If you request a copy of your CPNI in writing and we reasonably believe the request is valid, we will disclose the relevant information we have to you, or to any person designated by you, in accordance with federal law. However, subscribers to our Broadstripe Voice services should be aware that we generally do not provide them with records that we do not furnish in the ordinary course of business (for example, as part of a bill) or which are available only from our archives, without valid legal process such as a court order.

In addition, we cannot correct any errors in customer names, addresses, or telephone numbers appearing in, or omitted from, directory lists until the next available publication of those directory lists. Further, we may have no control over information appearing in the directory lists or directory assistance services of directory publishers or directory assistance providers which are not owned by us.

Broadstripe reserves the right to charge you for the cost of retrieving and photocopying any documents that you request.

7. Emails from Broadstripe

If you approve orally or in writing, Broadstripe will, from time to time, send you email notices regarding the Broadstripe Voice services and CPNI. You can opt out of receiving the emails that Broadstripe sends by following the instructions contained in the emails or by going to www.broadstripe.com and following the directions there. By going to this website and accessing your account, you may also request that Broadstripe provide such emails to you.

8. Changes to this CPNI Policy

Broadstripe reserves the right to modify this CPNI Policy at any time, subject to applicable law. We will notify you of any material changes through written, electronic, or other means and as otherwise permitted by law.

9. Contact Information

If you have any questions or suggestions regarding this CPNI Policy, or wish to contact us about your CPNI, please reach us as follows:

Telephone: (517) 319-3173
Email: rclark@broadstripe.com

You may write to us at:

2512 Lansing Road, Lansing, Michigan 48813

If you have online access to your Broadstripe Voice services account with Broadstripe and wish to grant Broadstripe approval to use, disclose and access to your CPNI, or to deny or restrict your approval, you may also go to www.broadstripe.com, access your account, and follow the

APPENDIX 2

DISCIPLINARY POLICY

Broadstripe takes seriously its obligations to protect confidential customer information, including customer proprietary network information ("CPNI"). A violation of Broadstripe's CPNI Operating Procedures will result in a written warning, and may result in immediate dismissal. Any second violation will result in immediate dismissal.

APPENDIX 3

OFFICER'S CPNI COMPLIANCE CERTIFICATE

I, Debra S. Wood, of Broadstripe, LLC ("Broadstripe"), certify that I have personal knowledge that Broadstripe has established operating procedures that are adequate to ensure compliance with the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations ("Customer Proprietary Network Information").


Signature

1-27-10
Date

ATTACHMENT TO OFFICER'S CPNI COMPLIANCE CERTIFICATE

Statement Regarding CPNI Operating Procedures

Broadstripe's written CPNI Operating Procedures ensure that Broadstripe will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of Broadstripe's CPNI Operating Procedures are:

- A requirement that Broadstripe have at all times a CPNI Compliance Supervisor to supervise the implementation of Broadstripe's CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- Detailed procedures for obtaining opt-out and opt-in approval from customers.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement for supervisory approval of all outbound marketing campaigns, including determination of any customer approval requirements for the campaigns.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI.

Actions Taken Against Data Brokers

Broadstripe was not required to take action against any data brokers in 2009

Broadstripe took the following actions against data brokers in [year]: [LIST]

Summary of Customer Complaints Based on Unauthorized Release of CPNI

Broadstripe received no customer complaints based on unauthorized release of CPNI in 2009

Broadstripe received the following customer complaints regarding unauthorized release of CPNI in [year]: [LIST]