Customer Proprietary Network Information Compliance Manual and Operating Procedures

For: Unitycomm LLC - 2012

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I. Definitions

A. **Customer proprietary network information** (CPNI) is the data collected by telecommunications companies about a consumer's telephone calls. It includes the time, date, duration and destination number of each call, the type of network a consumer subscribes to, and any other information that appears on the consumer's telephone bill.

B. Affiliate: A person that (directly or indirectly) owns or controls, is owned or controlled by or is under common ownership or control with, another person. The term "own" means to own an equity interest or the equivalent thereof) of more than 10 percent.

C. Carrier: See Telecommunications Carrier.

D. CMRS: Commercial Mobile Radio Service.

E. Communications-Related Services: Telecommunications services, information services typically provided by telecommunications carriers, and services related to the provision of maintenance of customers premises equipment.

F. Company: Unitycomm LLC, D/B/A U4

G. Customer: A person or entity to which a telecommunications carries is currently providing services.

H. Customer Proprietary Network Information (CPNI): Information that relates to the quality, technical configuration, type, destination, location, and amount of used 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 information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information.

I. Customer Premises Equipment (CPE): Equipment employed on the premises of a person (other than a carrier) to originate, route, or terminate telecommunications.

J. FCC: Federal Communications Commission.

K. Information Services: The offering of a capability for generating, acquiring, storing, transforming, processing, retrieving, utilizing, or making available information via telecommunications, and includes electronic publishing, but does not include any use of such capability for the management, control, or operation of a telecommunications system or the management of a telecommunications service.

L. Information Services Typically Provided by Telecommunications Carriers: Information services that telecommunications carriers typically provide, such as Internet access or voice mail services. The term does not include retail consumer services provided using Internet websites (such as travel reservations services or mortgage lending services); whether or not such services might otherwise be consider to be information services.

M. Local Exchange Carrier: Any person engaged in the provision of telephone exchange services or exchange access. Such term does not include a person insofar as such person is engaged in the provision of a commercial mobile service (except to the extent that the FCC determines that such service should be included in the definition of the term).

N. Opt-In Approval: A method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Under this approval method requires that the carrier obtain the customer's affirmative, express consent allowing the requested CPNI usage, disclosure, or access after the customer is provided appropriate notification of the Carrier's request.

O. Opt-out Approval: A method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Under this approval method requires a customer is deemed to have consented to the use, disclosure, or access to the customer's CPNI if the customer has failed to object thereto within the prescribed waiting period, after the customer is provided appropriate notification of the Carrier's request.

P. Subscriber List Information: Any information (1) identifying the listed names of a carrier's subscribers and the subscribers' telephone numbers, address, or primary advertising classifications (as such classifications are assigned at the time of the establishment of such services), or any combination of such listed names, numbers, addresses, or classifications; and (2) that the carrier or an affiliate has published, caused to be published, or accepted for publication in any directory format.

Q. Telecommunications Carrier: Any provider of telecommunications services, except that such term does not include aggregators of telecommunications services (as defined in 47 USC 26).

R. Telecommunications Service: The offering of telecommunications for a free directly to the public, or to such classes of users as to be effetely available directly to the public, regardless of the facilities used.

II. Statement of Corporate Policy

A. The policy of Unitycomm LLC is to comply with the letter and spirit of all laws of the United States, including those pertaining to CPNI in §222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and FCC's regulations, 47 CFR 64.2001-.2009. The Company's policy is to relay on the involvement of high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred. The FCC's regulations, 47 CFR 64.2009, requires the Company to implement a system to clearly establish the status of a customer's CPNI approval prior to the use or CPNI, and to train its personnel as to when they are, and are not, authorized to use CPNI, and to have and express disciplinary process in place. This manual constitutes the Company's policies and procedures related to CPNI. All employees are required to follow the policies and procedures specified in this Manual.

B. Any questions regarding compliance with applicable law and this Manual should be referred to Benjamin M. Plikerd (574) 457.4482 or Eric M. Wiggs (574) 457.4482

C. Any violation of, or departure from, the policies and procedures in this Manual shall be reported immediately to Benjamin M. Plikerd (574) 457.4482 or Eric M. Wiggs (574) 457.4482

III. Use of CPNI in General

A. Except as otherwise described in the Manual, when the Company receives or obtains CPNI by virtue of its provisioning of a telecommunications service, it can only use, disclose, or permit access to individually identifiable CPNI in its provision of:

1. The telecommunications service from which the information is derived; or

2. Service necessary to, or used in, the provisioning of the telecommunications service, including the publishing of directories.

IV. Guidelines for use of CPNI

A. The Company may not use, disclose, or permit access to CPNI to market services offerings to a customer that are within a category of service which the customer does not already subscribe from the Company, unless the Company has customer approval to do so (except that no customer approval is necessary in the situation describe in IV.D)

B. The Company cannot use, disclose or p3ermit access to CPNI to identify or track customers that call competing service providers. Thus, the Company may not use local service CPNI to track all customers that call its local service competitors.

C. The company may use, disclose or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of services 9i.e., local, interexchange, and CRMS) to which the customer already subscribes from the Company, without customer approval.

1. If the Company provides different categories of service, and a customer subscribes to more than one category of service offered by the Company, the Company may share CPNI among its affiliated entities that provide a service offering to the customer, without customer approval.

2. If the Company provides more than one offering by the carrier, the carrier is not permitted to share CPNI with its affiliates, except with the customer's approval as discussed in V, below.

D. The Company may use, disclose, or permit access to CPNI, without customer approval, as described below:

1. To provide inside wiring installation, maintenance, and repair services.

2. CRMS providers may use, disclose, or permit access to CPNI for the purpose of conducting research on the health effects of CMRS.

3. To market services formally known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, caller I.D., Call forwarding, and Centrex features.

4. For the provision of customer premises equipment and call answering, voicemail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

5. To protect the rights or propriety of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

6. Initiate, render, bill and, collect for telecommunications services;

7. Provide call location information concerning the user of a commercial mobile services in emergency situations; and

V. Obtaining Customer Approval for use of CPNI

A. Soliciting Customers Approval

1. The Company may obtain approval through written, oral or electronic methods.

a) If the Company relies on oral approval, it bears the burden of demonstrating that such approval has been given in compliance with the FCC's regulations.

b) A customer's approval or disapproval to use, disclose, or permit access to CPNI must remain in effect until the customer revokes or limits such approval or disapproval.

c) The Company must maintain records of approval, whether oral. Written or electronic, for at least one year.

B. Use of Opt-Out and Opt-In Approval Processes

1. The Company may utilize the opt-out or opt-in method to obtain approval to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services to that customer.

2. The Company may also utilize the opt-out or opt-in method to obtain approval to disclose the customer's individually identifiable CPNI, for the purpose of marketing communications-related services to that customer, to its agents, to its affiliates that provide communications-related services, and to its joint venture partners and independent contractors

3. If the Company discloses or provides access to CPNI to a joint venture partner or independent contractor, in addition to obtaining customer approval, it must enter into confidentiality agreements with such contractors or partners. The confidentiality agreement must:

a) Require that the independent contractor or joint venture partner use the CPNI only for the purpose of marketing or providing the communications-related services for which the Company has provided the CPNI;

b) Disallow the independent contractor or joint venture partner from using, allowing access to, or disclosing the CPNI to any other party, unless required to make such disclosure under force of law; and

c) Require that the independent contractor or joint venture partner have appropriate protections in place to ensure the ongoing confidentiality of customers' CPNI.

VI. Notices Required for Use of CPNI

A. Mandatory Notices regarding Solicitation

1. Prior to soliciting any customer approval to use, disclose, or permit access to customers' CPNI, the Company must notify the customer of the customer's right to restrict use of, disclosure of, and access to, the customer's CPNI.

2. The Company must maintain records of the notification, whether oral, written or electronic, for at least one year.

3. Content of notice: Customer notification must provide sufficient information to enable the customer to make an informed decision whether to permit a carrier to use, disclose, of permit access to, the customer's CPNI. The information must:

a) State that the customer has a right, and the Company has a duty, under federal law, to protect the confidentiality of CPNI.

b) Specify the types of information that constitute CPNI and the specific entities that will received the CPNI, describe the purposes for which CPNI will be used, and inform the customer of the right to disapprove those uses, and deny of withdraw access to CPNI at any time.

c) Advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, the Company may provide a brief statement, in clear and neutral language, describing consequences directly resulting form lack of access to CPNI.

d) Be comprehensive and not misleading

e) State that any approval of denial of approval for the use of CPNI outside of the service to which the customer already subscribes for that carrier is valid until the customer affirmatively evokes or limits such approval of denial.

4. If written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.

5. If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.

6. The Company may state in the notification that the customer's approval to use CPNI may enhance the carrier's ability to offer products and services tailored to the customer's needs. The Company also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

7. A carrier may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

8. The Company's solicitation for approval must be proximate to the notification of Customer's CPNI Rights.

B. Opt-Out Notice Requirements

1. The Company must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except for one-time use of CPNI, as discussed in VI.D, below). The contents of any such notification must comply with the requirements of VI.A.3, above.

a) The Company must wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. The Company may, in its discretion, provide for a longer period. The Company must notify the customers as to the applicable waiting period for a response before approval is assumed.

(1) In the cans of an electronic form of notification, the waiting period begins to run from the date on which the notification was sent

(2) In the case of notification by mail, the waiting period begins to run on the third day following the date that the notification was mailed.

2. If the Company uses the opt-out mechanism it must provide notices to its customers every two years.

3. Use of E-mail: if the Company uses e-mail to provide opt-out notices, it must comply with the following additional requirements:

a) The Company must have express, verifiable, prior approval from customers to send notices via e-mail regarding their service in general, or CPNI in particular;

b) Customers must be able to reply directly to e-mails containing CPNI notices in order to opt-out.

c) Opt-out e-mail notices that are returned to the Company as undeliverable must be sent to the customer in another form before the Company may consider the customer to have received notice; and

d) The subject line of the e-mail must clearly and accurately identify the subject matter of the e-mail.

e) The Company must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. The Company may satisfy this requirement through a combination of methods,

so long as all customer have the ability to opt-out at no cost and are able effectuate that choice whenever they choose.

C. Opt-In Notice Requirements

1. The Company may provide notification to obtain opt-in approval through oral, written, of electronic methods. The contents of any such notification must comply with the requirements described in VI.A.3, above.

D. Notice Requirements Specific to One-Time Use of CPNI

1. The Company may use oral notice to obtain limited, one time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call regardless of whether carriers use opt-out or opt-in approval based on the nature of the contact.

2. The contents of any such notification must comply with the requirements of VI.A.3, except that the Company may omit any of the following if not relevant to the limited use for which the carrier seeks CPNI:

a) The Company need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election.

b) The company need not advise customers that it may share CPNI with its affiliate(s) or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclose to, an affiliate or third party.

c) Carriers need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as carriers explain to customers that the scope of the approval the carrier seeks is limited to one-time use.

d) Carriers may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as the carrier clearly communicates that the customer can deny access to his CPNI for the call.

E. Opt-In Requirement

1. Except for use and disclosure of CPNI that is permitted without customer approval as discussed above, and except for the purpose of marketing communications-related services to a customer, the Company may only use, disclose, or permit access to a customer's individually identifiable CPNI subject to opt-in approval.

VII. Company Safeguards and Recordkeeping Requirements

A. Management Safeguards

1. Training of Company personnel will include review of this Manual by all new employees and all existing employees who have not previously done so.

2. The Company will provide additional training on as needed basis.

3. Company personnel will make no decisions regarding CPNI without first consulting one of the following individuals: Benjamin M. Plikerd, or Eric M. Wiggs

4. The company's personnel must obtain supervisory approval from a person listed in VII.A.3 above regarding any proposed use of CPNI.

5. In deciding whether the contemplated us of the CPNI is proper, the individual(s) listed in VII.A.3 will consult this manual, applicable FCC regulations or Compliance Guide, and, if necessary, legal counsel.

6. The person(s) listed in VII.A.3 above will personally oversee the use of approval methods and notice requirements for compliance with all legal requirements.

7. The person(s) listed in VII.A.3 above will also ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.

8. Any improper use of CPNI will result in disciplinary action in accordance with established Company disciplinary policies. Any improper use shall be treated as a serious offence, and may result in suspension or termination of employment in appropriate cases. Any company personnel making improper use of CPNI will undergo additional training to ensure future compliance.

9. The Company will provide written Notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly; to such a degree that consumers' inability to opt-out is more than an anomaly.

a) The notice will be in the form of a letter, and will include the Company's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when I will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

b) The Company must submit the notice even if the Company offers other methods by which customers may opt-out.

10. On an annual basis, a corporate officer of the Company will sign a compliance certificate (appendix 1) stating that the officer has personnel knowledge that the company compliance with the FCC's Rules.

11. The Company will review these procedures on a continuing basis to ensure compliance with all FCC regulations, and will revise these procedures as needed to reflect any subsequent revisions to the applicable Rules and Regulations addressing CPNI.

B. Recordkeeping

1. The company will maintain records of its own sales and marketing campaigns that use CPNI in files clearly identified as such. The records include a description of each campaign, the specific CPNI that was used in the campaign and the products and services that were offered as part of the campaign. The Company will maintain these records in its offices for a minimum of one year.

2. The Company will maintain records of its affiliates' sales and marketing campaigns that use CPNI in files clearly identified as such. These records will include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as part of the campaign. The Company will maintain these records in its offices for a minimum of one year.

3. The Company will maintain records of all instances where it disclose or provided CPNI to third parties, or where third parties are allowed access to CPNO, in files clearly identified as such. These records will include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as part of the campaign. The Company will maintain these records in its offices for a minimum of one year.

4. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis

5. The company will maintain separate files in which it will retain any court orders respecting CPNI.

VIII. Appendix 1 - Certificate of Compliance with Protection of Customer Proprietary Network Information Rules

Annual 47 CFR 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012

Date filed: March 1, 2012

Name of company covered by this certification: Unitycomm LLC

Form 499 Filer ID: 824558

Name of signatory: Benjamin M. Plikerd

Title of signatory: Managing Member

I, Benjamin M. Plikerd, certify that I am and 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 requirements set forth in 47 CFR 64.2001 et. Seq. of the Commission's rules.

The company did not any action against data brokers in the year 2011. 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 received one customer complaint in the past year concerning the unauthorized release of CPNI in regards to unauthorized access to CPNI. Case NO. 11-00007-128 in summary UnityComm LLC did not have any records of incoming or out going calls during the time period for which the investigation was requesting. UnityComm LLC handled the local loop and the LD for that specified number, and CenturyLink would route. Telebill, UnityComm's CDR processing company provided any relevant details to the case, and completed paperwork was returned to the Indiana Attorney General.

Benjamin M. Plikerd

Managing Member

IX. Appendix 2 - Employee Verification of CPNI Training and Review of CPNI Manuel

Employee Name:

Date:

I have reviewed the Company's Customer Proprietary Network Information Compliance Manual and Operating Procedures and agree to comply with the procedures set forth therein.

_____ _____

Employee Signature Date

X. Appendix 3 - Sample Opt-Out Notice

Unitycomm LLC (Company) utilizes Customer Proprietary Network Information (CPNI) when providing telecommunication products and services to its customers. CPNI is defined as information related to the quality, technical configuration, destination and amount of use of telecommunications services, including information that may appear on a customer's bill. Information published in the telephone directory is not CPNI. Under Federal Law, telephone companies have a duty to protect this information.

As a customer, you have the right at any time to restrict the use of CPNI for marketing purposes. This is considered an "Opt-Out" approach. Your approval to use CPNI may enhance the company's ability to offer products and services tailored to your needs.

The Company proposes to use your CPNI to [specify: (1) the information that will be used, (2) the specific entities that will receive the CPNI, () the purposes of which CPNI will be used]. If you wish to Opt-Out, you should take the following steps: send a request to:

CPNI Opt-Out
U4
PO Box 250
Syracuse, IN 46567

Or email request to eric.wiggs@email.u4corp.com with "CPNI Opt-Out" in the subject line.

Or bring request to Unitycomm LLC's offices at 101 E. Main St., Syracuse, Indiana, and present them to Eric M. Wiggs, Director of Implementation.

Your decision to opt-out will not affect the provision of any services to which you subscribe. The Company does not and will not sell or offer such information to any third party, except as permitted under Federal Communications Commission regulations. Once you opt-out, you will remain on this list until your request otherwise. If the Company does not receive an opt-out from you prior to the expiration of the 30-day period following the Company's sending of this notice to you, it will be assumed that you approve of its proposed use of your CPNI.