

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

1. It is Spectrotel, Inc. (hereafter referred to as "Spectrotel") policy 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. Spectrotel follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or Spectrotel. However, Spectrotel 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, Spectrotel 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. Spectrotel 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, Spectrotel shall not wait the additional seven (7) days to notify its customers if Spectrotel determines there is an immediate risk of irreparable harm to the customers.
 - D. Spectrotel 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, Spectrotel shall prohibit 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 customer's address of record, or
 3. When Spectrotel calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated.

- Records of approvals are maintained for at least one year.
 - Spectrotel provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI.
 - The content of Spectrotel's CPNI notices comply with FCC rule 64.2008 (c).
8. Spectrotel 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. Spectrotel has a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one year. Specifically, Spectrotel'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 Spectrotel.
 10. Spectrotel notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
 11. Spectrotel may negotiate alternative authentication procedures for services that Spectrotel provides to business customers that have a dedicated account representative and a contract that specifically addresses Spectrotel's protection of CPNI.
 12. Spectrotel is prepared to provide written notice within five business days to the FCC of any instance where the opt-in mechanisms do not work properly to such a degree that consumer's inability to opt-in is more than an anomaly.

ANNUAL 47 C.F.R. S: 64.2009 (e) CPNI CERTIFICATION FOR 2012
EB Docket 06-36

Date Filed: January 27, 2012
Name of Company: Spectrotel
Form 499 Filer ID: 819208
Name of Signatory: Ed Kazar
Title of Signatory: Vice President

I, Ed Kazar, 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.

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. The steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

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

Signed: _____

