

CitiBroadband Wireless, Inc.
Statement of CPNI Operating Procedures

CitiBroadband Wireless, Inc. (“CitiBroadband”) did not provide service in 2011; however, CitiBroadband has established policies and procedures to comply with the Federal Communications Commission’s (“FCC’s”) rules regarding the use, disclosure, and access to customer proprietary network information (“CPNI”) in accordance with §64.2001 *et seq.* of the Commission’s rules, 47 C.F.R. §64.2001 *et seq.* This statement is a summary of CitiBroadband’s policies and procedures designed to safeguard CPNI.

CitiBroadband has substantial processes and control for both physical security and access to data. Its customers will be provided services under contracts with express confidentiality provisions, verification methods to confirm the identity of customer’s authorized persons to receive the customer’s CPNI. Business customer will have dedicated account representatives with access to customer data. CitiBroadband will maintain and utilize CPNI for the limited purposes of initiating, rendering billing and collecting of its services, and may use CPNI, if necessary, to protect its property rights. CitiBroadband will not use any CPNI for any marketing purposes, nor will CitiBroadband disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

CitiBroadband has implemented measures to discover and to protect against unauthorized attempts to access CPNI. CitiBroadband has also implemented measure to discover and to protect against unauthorized attempts to access CPNI. In addition, CitiBroadband has implemented procedures pursuant to which it will track breaches of CPNI, and it will notify the United States Secret Service and the Federal Bureau of Investigation. CitiBroadband will notify its customers of the security breach, if permitted, and will notify of the breaches and notifications for a two-year period. CitiBroadband will track customer complaints regarding CPNI.

CitiBroadband will train its employees as to when they are and are not permitted to use, permitted access to, or permitted to disclose CPNI. CitiBroadband will institute a disciplinary process in place to address any noncompliance with its policies, including policies regarding CPNI, which includes the potential for termination.

CitiBroadband will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.