

STATEMENT

Richard E. Myers, Communications Evolutions (“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 adopted a manual and keeps it updated with FCC CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.
- 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 has implemented a system whereby the status of a customer’s CPNI approval can be determined prior to the use of CPNI.
- Carrier **does not maintain a record of** its and its affiliates' sales and marketing campaigns that use its customers' CPNI **as we do not have any customer information that pertains to CPNI**. Carrier **does not maintain any type of** record of any instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI **or any** 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 **not** established a supervisory review process regarding compliance with the CPNI rules **since we do not do any type of** outbound marketing situations **with regard to CPNI records**.
- Carrier **does not have any** established procedures to notify law enforcement and customer(s) **of any discloser** of unauthorized disclosure of CPNI **since we do not manage any type of customer information that pertains to CPNI information**.
- Carrier took the following actions against data brokers in 2011, including proceedings instituted or petitions filed by Carrier at a state 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 2011 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2011 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: **None**

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CPNI Certification

- 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 the information
 - 0 Number of other instances of improper access or disclosure
- Description of instances of improper access or disclosure: **None**