# Metro Communication Comp., Inc.

## Statement of CPNI Procedures and Compliance

Metro Communication Comp., Inc. ("Metro Communication") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, Metro Communication does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. Metro Communication does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The company provides service only to other carriers. Metro Communication typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service.

Metro Communication may obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because Metro Communication provides exclusively carrier-to-carrier services, it does not use any call detail information that it obtains in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers.

Moreover, the call detail information obtained by Metro Communication is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

Metro Communication safeguards from improper use or disclosure by employees the call detail information that Metro Communication obtains in providing its carrier-to-carrier services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, Metro Communication has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to Metro Communication computers and call detail records. In the event of unauthorized CPNI access, Metro Communication will notify the requisite law enforcement agencies, and the customer when possible.

Metro Communication did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because Metro Communication does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through Metro Communication, it cannot notify those end-user customers directly if a breach occurs. However, Metro Communication has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than information that has been publicly reported, regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

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## Annual CPNI Certification
## 47 C.F.R. § 64.2009(e)
## EB Docket No. 06-36

COMPANY NAME: Metro Communication Comp., Inc.
REPORTING PERIOD: January 1, 2013 - December 31, 2013
FILER ID: 826756
OFFICER: Zak Horn
TITLE: President

I, Zak Horn, hereby certify that I am an officer of Metro Communication Comp., Inc. ("Metro Communication") and that I am authorized to make this certification on behalf of Metro Communication. I have personal knowledge that Metro Communication has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Metro Communication or to any of the information obtained by Metro Communication. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Metro Communication employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Metro Communication or to the information obtained by Metro Communication.

Signed: Zak Horn
On behalf of Metro Communication Comp., Inc.

Date: 1/16/14