STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. PART 64 SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)
MARCH 1, 2014

The following statement explains how the operating procedures of Inland Cellular LLC, Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership (collectively "Inland Cellular" or "Company") ensure that it is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. Part 64 Subpart U (§§ 64.2001-64.2011) and is relevant to calendar year 2013. Except as otherwise indicated, the following applies with respect to the Commission's rules in effect both before and after the December 8, 2007 effective date of the Commission's April 2, 2007 Report and Order in CC Docket No. 96-115. *See* FCC 07-22 (rel. Apr. 2, 2007); Public Notice, DA 07-4915 (rel. Dec. 6, 2007). This statement covers calendar year 2013.

I. Use of customer proprietary network information without customer approval.

A. Inland Cellular may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already subscribes from Inland Cellular, without customer approval.

Inland Cellular presently offers CMRS to its customers.

B. Inland Cellular may not use, disclose, or permit access to CPNI to market to a customer, service offerings that are within a category of service to which the subscriber does not already subscribe from Inland Cellular, unless Inland Cellular has customer approval to do so, except as described in Section I.C.

(1) Inland Cellular may use, disclose or permit access to CPNI derived from their provision of wireless service, without customer approval, for the provision of CPE and information services.

(2) Inland Cellular may not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.

C. Inland Cellular may use, disclose, or permit access to CPNI, without customer approval, as follows:

(1) Inland Cellular may use, disclose, or permit access to CPNI, in its provision of installation, maintenance, and repair services.

(2) Inland Cellular may use, disclose, or permit access to CPNI for the purpose of conducting research on the health effects of commercial mobile radio services ("CMRS").

(3) Inland Cellular may use CPNI to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

D. Inland Cellular may use, disclose, or permit access to CPNI to protect Inland Cellular's rights or property; to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, Inland Cellular's services; and to render, provision, bill or collect for services.

Inland Cellular's operating procedures comply with these requirements and include, but are not limited to, the provisions described below. The Company does not engage in any outbound telemarketing. Outbound print marketing, if any, that may be distributed by the Company by mail is addressed to all subscribers or customers within the applicable geographic area, zip code(s) and/or telephone number prefix(es), without regard to the specific services that the subscriber or customer receives, or does not receive, from the Company and/or the Company's affiliates. Under Company policy, none of the Company's affiliates is permitted to use any CPNI of the Company for any outbound telemarketing or outbound print marketing.

Moreover, the Company does not use any CPNI for any inbound marketing of services that are not within a category of service (i.e., local, interexchange, and CMRS) to which the customer already subscribes from the Company and/or one or more of the Company's affiliates. The Company does not sell, or provide access to any third party to, any of the Company's CPNI for purposes of marketing the services of the Company or of any of its affiliates, other than as permitted without prior customer approval with respect to the Company's affiliates. Except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto, and pursuant to reciprocal roaming agreements, the Company does not provide CPNI to any third-party for any purpose.

The Company, its employees and agents may make such other uses and disclosures of, and permit access to, CPNI without customer approval as are permitted by applicable statute, rule, regulation or order. Such uses, disclosures or access may include those authorized by Section 222(c) and (d) of the Communications Act of 1934, as amended, by Section 64.2005 of the Commission's rules and by orders of the Commission.

Except as set forth above, the Company does not provide any CPNI to any governmental entity, or to any other third party, other than: pursuant to subpoena or other lawful process or with the subscriber's prior written consent, or in accordance with the authentication and other requirement described below and in the FCC's rules, as a result of a person representing himself or herself to be the subscriber (or the subscriber's duly authorized agent) and having confirmed his or her identity or authority by providing to the Company appropriate identifying information (such as Social Security Number, driver's license number, mother's maiden name, user name or password, as appropriate) or documentation, or otherwise being recognized by the Company as being the subscriber or the subscriber's duly authorized agent.

II. Approval required for use of customer proprietary network information.

A. Inland Cellular may obtain customer approval through written, oral or electronic methods.

(1) Inland Cellular does not seek or obtain oral approval, and therefore does not bear the burden of demonstrating that such approval has been given in compliance with the FCC's rules.

(2) A customer's approval or disapproval obtained by Inland Cellular to use, disclose, or permit access to the customer's CPNI, the use of CPNI outside of the customer's total service relationship with Inland Cellular must remain in effect until the customer revokes or limits such approval or disapproval.

(3) Inland Cellular must maintain records of notification and approval, whether oral, written or electronic, for at least one year.

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

(1) Except where use, disclosure, or access to CPNI is otherwise permitted without prior customer approval (as described above), Inland Cellular only uses, discloses or permits access to CPNI upon opt-out or opt-in approval, consistent with Section 64.2007 of the Commission's rules and, by December 8, 2007, with the Commission's amended rules.

(2) Except for use and disclosure of CPNI that is permitted without customer approval under Section I, or that is described Section II.B, or as otherwise provided in section 222 of the Communications Act of 1934, as amended, Inland Cellular may only use, disclose, or permit access to its customer's individually identifiable CPNI subject to opt-in approval.

The Company currently does not use CPNI in a manner that requires prior customer approval. Should this Company policy change, however, the foregoing policies will be applicable and policies will be implemented to ensure that the FCC's rules are complied with.

III. Notice required for use of customer proprietary network information.

A. Notification, Generally.

(1) Prior to any solicitation for customer approval, Inland Cellular must provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.

(2) Inland Cellular must maintain records of notification, whether oral, written or electronic, for at least one year.

B. Individual notice to customers must be provided when soliciting approval to use, disclose, or permit access to customers' CPNI.

C. Content of Notice.

Customer notification must provide sufficient information to enable the customer to make an informed decision as to whether to permit Inland Cellular to use, disclose, or permit access to, the customer's CPNI.

(1) The notification must state that the customer has a right, and Inland Cellular has a duty, under federal law, to protect the confidentiality of CPNI.

(2) The notification must specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.

(3) The notification must 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, Inland Cellular may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.

(4) The notification must be comprehensible and must not be misleading.

(5) 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.

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

(7) Inland Cellular may state in the notification that the customer's approval to use CPNI may enhance Inland Cellular's ability to offer products and services tailored to the customer's needs. Inland Cellular also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

(8) Inland Cellular may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

(9) The notification must state that any approval or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from Inland Cellular is valid until the customer affirmatively revokes or limits such approval or denial.

(10) Inland Cellular's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

D. Notice Requirements Specific to Opt-Out.

Inland Cellular must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except as provided in paragraph F of this section). The contents of any such notification must comply with the requirements of paragraph C of this section.

(1) Inland Cellular 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. Inland Cellular may, in its discretion, provide for a longer period. Inland Cellular must notify customers as to the applicable waiting period for a response before approval is assumed.

(i) In the case of an electronic form of notification, the waiting period shall begin to run from the date on which the notification was sent; and

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

(2) Insofar as Inland Cellular is using the opt-out mechanism, it must provide a Notice to its customers every two years.

(3) If Inland Cellular uses e-mail to provide opt-out notices, it must comply with the following requirements in addition to the requirements generally applicable to notification:

(i) Inland Cellular must obtain express, verifiable, prior approval from consumers to send notices via e-mail regarding its service in general, or CPNI in particular;

(ii) Inland Cellular must allow customers to reply directly to e-mails containing CPNI notices in order to opt-out;

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

(iv) Inland Cellular must ensure that the subject line of the message clearly and accurately identifies the subject matter of the e-mail; and

(v) Inland Cellular 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. Inland Cellular may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

E. Notice Requirements Specific to Opt-In.

Inland Cellular may provide notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the requirements of paragraph C of this section.

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

(1) Inland Cellular 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 Inland Cellular uses 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 paragraph C of this section, except that Inland Cellular may omit any of the following notice provisions if not relevant to the limited use for which Inland Cellular seeks CPNI:

(i) Inland Cellular need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election;

(ii) Inland Cellular need not advise customers that they may share CPNI with their affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party;

(iii) Inland Cellular need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as Inland Cellular explains to customers that the scope of the approval Inland Cellular seeks is limited to one-time use; and

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

The Company currently does not use CPNI in a manner that requires prior customer approval. Should this Company policy change, however, the foregoing policies will be applicable and Inland Cellular will implement policies to ensure that the FCC's rules are complied with.

IV. Safeguards required for use and disclosure of customer proprietary network information.

A. Inland Cellular must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

B. Effective December 8, 2007, Inland Cellular may release call detail information during a customer initiated telephone contact only if reasonable authentication procedures are

complied with and (1) the customer provides Inland Cellular with a pre-established password, (2) Inland Cellular, at the customer's request, sends the call detail information to the customer's address of record provided the address of record has been associated with the account for at least thirty (30) days, or (3) when Inland Cellular calls the telephone number of record to disclose the call detail information. Inland Cellular is permitted to create a back-up customer authentication method for lost or forgotten passwords. Inland Cellular is also prohibited from releasing call detail information during a retail visit without the appropriate password or valid photo identification.

However, if the during a customer-initiated telephone contact, the customer is able to provide without assistance from Inland Cellular personnel all of the call detail information necessary to address a customer service issue (i.e., the telephone number called, when it was called, and if applicable the amount charged for the call), then Inland Cellular personnel are permitted to proceed with its routine customer care procedures with respect to such call detail information.

C. Not later than June 8, 2008, Inland Cellular must authenticate a customer without readily available biographical or account information prior to allowing the customer on-line access to CPNI related telecommunication service account. Once authenticated, the customer may only obtain on-line access to CPNI related telecommunications service account through a password.

D. Effective December 8, 2007, Inland Cellular is required to notify customers immediately when a password or back-up means of authentication for lost or forgotten passwords, on-line account, or address of record is created or changed. Such notification is not required when the customer initiates service, including the selection of a password.

E. Business customers are exempt from the password requirements which became effective December 8, 2007, if: the customer is contractually bound to Inland Cellular, is serviced by a dedicated Inland Cellular account representative as the primary contact, and within the contract Inland Cellular is responsible to address its CPNI obligations. If, at any point, the business customer must go through a call center to reach a customer service representative, then the exemption does not apply.

F. Inland Cellular trains its personnel as to when they are and are not authorized to use CPNI, and Inland Cellular must has an express disciplinary process in place.

G. Inland Cellular must maintain a record, electronically or in some other manner, of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. Inland Cellular shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include 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. Inland Cellular shall retain the record for a minimum of one year.

H. Inland Cellular must establish a supervisory review process regarding its compliance with the FCC's CPNI rules for outbound marketing situations and maintain records of its

compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

I. Effective December 8, 2007, Inland Cellular must take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, which may include encryption of its databases. Inland Cellular must properly authenticate a customer prior to disclosing CPNI based on a customer-initiated telephone contact, on-line account access, or an in-store visit. Inland Cellular must take measures to protect CPNI stored in its internal databases from potential unauthorized access, and evaluate and increase its security measures should it discover an increase in attempts to gain access to unauthorized information.

J. Inland Cellular must 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.

(1) The notice shall be in the form of a letter, and shall include Inland Cellular's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it 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.

(2) Such notice must be submitted even if Inland Cellular offers other methods by which consumers may opt-out.

K. Effective December 8, 2007, Inland Cellular has a general duty to first inform federal law enforcement agencies, followed up by notification to affected customers, after reasonable determination of a breach of its customers' CPNI.

(1) Inland Cellular must file an electronic notification to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) within seven (7) business days through the central reporting facility furnished by the Commission.

(2) Inland Cellular is prohibited from notifying customers or the general public of the breach until seven (7) business days have passed after notification to the USSS and FBI unless under certain specified circumstances: (a) Inland Cellular identifies an "extraordinary need to notify customers" before that period or (b) An ongoing or potential investigation or national security requires customer disclosure to be potentially delayed for up to thirty (30) days. Inland Cellular must notify the affected customer(s) after the applicable period.

(3) Inland Cellular must maintain a record, whether electronically or in some other manner of any breaches discovered, notifications made to the USSS or FBI and notifications made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Records must be maintained for a two (2) year period.

Inland Cellular's operating procedures comply with all of the above requirements, including those that became effective December 8, 2007. With respect to online authentication

in particular, Inland Cellular has implemented measures to ensure compliance by the applicable June 8, 2008 deadline. Company personnel are trained as to when they are and are not authorized to use CPNI.

V. Supplemental Information

Effective December 8, 2007, the FCC's rules require that the annual certification filed pursuant to 47 C.F.R. § 64.2009(e) disclose any actions taken against data brokers and a summary of all consumer complaints received in the previous calendar year regarding the unauthorized release of CPNI. Inland Cellular is not aware of any consumer complaints regarding the unauthorized release of CPNI and has not taken action against any data brokers.