

STATEMENT

Clark Communications, Inc. ("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 implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- ⌞ 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 maintains record of its and its affiliates' sales and marketing campaigns that use its customers CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The records includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.
- ⌞ Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding CPNI, and a process ensures that opt-out elections are recorded and followed.
- ⌞ Carrier took the following actions against data brokers in 2013 and to the present, 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 2013 and to the present regarding the unauthorized release of CPNI:
 - ⌞ Number of customer complaints Carrier received in 2013
 - ⌞ and to the present related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: **None**
 - ⌞ 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

7 Description of instances of improper access or disclosure: None