

CPNI Compliance Statement and Operating Procedures of
IDeACOM Solutions Group LLC

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007) ("EPIC CPNI Order"), IDeACOM Solutions Group LLC and affiliated entities makes the following statement:

IDeACOM Solutions Group LLC has established policies and procedures to comply with the Federal Communications Commission's (FCC) rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. 64.2001 et seq. These procedures ensure that IDeACOM Solutions Group LLC is compliant with the FCC's customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize IDeACOM Solutions Group LLC's policies and procedures designed to safeguard CPNI.

IDeACOM Solutions Group LLC has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. IDeACOM Solutions Group LLC is engaged in training their personnel as to when they are and are not authorized to use CPNI, and IDeACOM Solutions Group LLC has an express disciplinary process in place.

IDeACOM Solutions Group LLC uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary to protect its property rights. IDeACOM Solutions Group LLC does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service. IDeACOM Solutions Group LLC has established a supervisory review process regarding its compliance with the CPNI rules regarding outbound marketing situations and maintains records for one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

IDeACOM Solutions Group LLC has established procedures to verify an incoming caller's identity. IDeACOM Solutions Group LLC trains its personnel in both the use of CPNI, and protection of its confidentiality. These procedures are detailed in IDeACOM Solutions Group LLC's CPNI Manual. IDeACOM Solutions Group LLC also limits the number of employees that have access to customer information and call data.