

## **PELLA FIBER**

### **OPERATING PROCEDURES FOR COMPLIANCE WITH CPNI RULES**

Pella Fiber (the "Company") has implemented the following procedures to ensure that it is compliant with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Network Information (CPNI), § 64.2001 through § 64.2011.

#### **Compliance Officer**

The Company has appointed a CPNI Compliance Officer. The Compliance Officer is responsible for ensuring that the Company complies with all the CPNI rules. The Compliance Officer is also the point of contact for anyone (internally or externally) with questions about CPNI.

#### **Employee Training**

The Compliance Officer arranges for the training of all employees on a regular basis, and more frequently as needed. Any new employee is trained when hired by the Company. The training includes, but is not limited to, when employees are and are not authorized to use CPNI, and the authentication methods the company is using.

After the training, all employees are required to sign a certification that they have received training on the CPNI rules, that they understand the Company's procedures for protecting CPNI and they understand the Company's disciplinary process for improper use of CPNI.

Employees are instructed that if they ever have any questions regarding the use of CPNI, if they are aware of CPNI being used improperly by anyone, or if they encounter someone other than the authorized person on an account trying to access CPNI that they should contact the Compliance Officer immediately. The Compliance Officer will then determine what actions need to be taken.

#### **Disciplinary Process**

The Company has established a specific disciplinary process for improper use of CPNI. The disciplinary action is based on the type and severity of the violation and could include any or a combination of the following: retraining the employee on CPNI rules, notation in the employee's personnel file, formal written reprimand, suspension or termination.

The disciplinary process is reviewed with all employees.

#### **Customer Notification and Request for Approval to Use CPNI**

The Company has not provided notification to its customers and has not asked for approval to use CPNI because it only uses CPNI in those instances where it is permissible to use CPNI without customer approval. It does not share the customer's CPNI with any joint venture partner, independent contractor or any other third party.

If the Company receives a call from a customer who wants to discuss services outside of the customer's existing service offerings, the customer service representative uses the oral notification for one-time use of CPNI to obtain approval for the duration of the call only.

If, in the future, the Company decides to ask customers for approval to use their CPNI, it will implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

### **Marketing Campaigns**

The Company does mass marketing to all its customers. The Company does not conduct any marketing campaigns using CPNI. If, in the future, the Company decides to have a marketing campaign that uses CPNI, it will establish a supervisory review process and a process for maintaining a record of the campaign before any campaign is conducted.

### **Authentication**

The Company does not disclose any CPNI until the customer has been appropriately authenticated as follows:

**In-office visit** - the customer must provide a valid photo ID matching the customer's account information.

**Customer-initiated call** - the customer is authenticated by providing an answer to a pre-established question and must be listed as a contact on the account.

If the customer wants to discuss call detail information that requires a password, the following guidelines are followed:

- If the customer can provide all the call detail information (telephone number called, date of the call, the amount of the call, etc.) necessary to address the customer's issue, the Company will continue with its routine customer care procedures.
- If the customer cannot provide all of the call detail information to address the customer's issue, the Company will: (1) call the customer back at the telephone number of record, (2) send the information to the address of record, or (3) ask the customer to come into the office and provide a valid photo ID.

### **Notification of Account Changes**

The Company promptly notifies customers whenever a change is made to the following:

- Address of record.
- Password

The notification to the customer will be made either by a Company-originated voicemail, email or letter sent to the address that has been associated with the account for at least 30 days. It will not be sent to the new address.

### **Notification of Breaches**

Employees will immediately notify the Compliance Officer of any indication of a breach. If it is determined that a breach has occurred, the Compliance Officer will follow the appropriate procedures and notify the USS and FBI via the FCC link at <http://www.fcc.gov/eb/cpni>.

### **Annual Certification**

The Compliance Officer will file a Compliance Certification with the FCC by March 1 of each year for data pertaining to the previous calendar year.

**Record Retention**

The Company retains all information regarding CPNI. Following is the minimum retention period the company has established:

- Breaches – two years
- Annual certification – seven years
- Employee training certification – two years
- All other information – two years