

**BRASADA RANCH UTILITY COMPANY  
STATEMENT OF CPNI OPERATING PROCEDURES  
EFFECTIVE JULY 1, 2009**

Brasada Ranch Utility Company ("BRUC") has established policies and procedures to comply with regulations regarding the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in 47 C.F.R. § 64.2001 *et seq.*, 47 U.S.C. § 222, and OAR 860-032-0510. This statement is a summary of BRUC' policies.

1. BRUC may use, disclose and/or permit access to CPNI:

(A) for the provision of the telecommunications services from which such information is derived;

(B) for the provision of services necessary to, or used in, the provision of such telecommunication service, including the publishing or directories; or,

(C) for the following limited purposes:

(1) to initiate, render, bill, and collect for telecommunications services;

(2) to protect the rights or property of BRUC, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services;

(3) to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if such call was initiated by the customer and the customer approves the user of such information to provide such services; and,

(4) to the extent applicable, to provide call location information concerning the user of a wireless service:

(i) to a public safety answering point, emergency medical service provider, or emergency dispatch provider, public safety, fire service, or law enforcement official, or hospital emergency or trauma care facility, in order to respond to the user's call for emergency services;

(ii) to inform the user's legal guardian or member of the user's immediate family of the user's location in an emergency situation that involves the risk of death or serious physical harm; or

(iii) to providers of information or database management services solely for purposes of assisting in the delivery of emergency services in response to an emergency.

2. BRUC does not use CPNI to conduct outbound marketing or in connection with its sales and marketing campaigns. BRUC also does not disclose or permit access to CPNI to affiliates or third parties for marketing purposes.

3. BRUC trains its personnel who deal with CPNI regarding these procedures, including when personnel are and are not permitted to use CPNI. BRUC has established disciplinary procedures for violations of these policies and procedures by personnel.

4. BRUC has implemented procedures to authenticate its customers.

5. BRUC has instituted measures to discover and protect against unauthorized attempts to access CPNI. Among other measures, BRUC has implemented internal security procedures and other network security protocols.

6. BRUC has implemented policies pursuant to which it will track any breaches of CPNI, and will notify the appropriate authorities and the affected customers (as permitted) upon discovery of a CPNI security breach. BRUC will maintain a record of such information for a two-year period.

7. BRUC will track customer complaints regarding CPNI.

8. BRUC will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that BRUC has established to safeguard CPNI, which will include information regarding actions against data brokers and a summary of all customer complaints regarding the unauthorized use of CPNI.