

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018.

1. Date filed: January 11, 2019
2. Name of Companies covered by this certification: United Telephone Association, Inc.
3. Form 499 Filer ID: 808701.
4. Name of signatory: Todd Houseman
5. Title of signatory: General Manager
6. Certification:

I, Todd Houseman, certify that I am an officer of the Companies named above, and acting as an agent of the Companies, that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Companies procedures ensure that the Companies are in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The Companies have not taken actions (i.e., proceedings instituted or petitions filed by the Companies at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Companies have not received customer complaints in the past year concerning the unauthorized release of CPNI.

The Companies represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Companies also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

A handwritten signature in blue ink, appearing to read "Todd Houseman", is written over a horizontal line.

Attachments: Accompanying Statement explaining CPNI procedures.

Attachment A
Statement Concerning Procedures Ensuring Compliance with CPNI Rules

The operating procedures of United Telephone Association, Inc. (Form 499 Filer ID 808701), United Communications Association, Inc. (Form 499 ID 801544), United Wireless Communications, Inc. (Form 499 ID 825700) and WestLink Communications, LLC (Form 499 ID 821344)(the "Companies") ensure that the Companies comply with Part 64, Section 2001 et.seq. of the FCC rules governing the use of Customer Proprietary Network Information ("CPNI").

The Companies have established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Companies rely on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The companies train its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The companies have an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Companies' CPNI Operating Procedures.

The Companies maintain records of their own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Companies have a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Companies require that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In-store visits require a valid photo ID.

The companies maintain a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.