



**CERTIFICATION PURSUANT TO 47 C.F.R. § 64.2009(e)
EB DOCKET 06-36
COMPLIANCE WITH FCC CPNI RULES
ANNUAL CERTIFICATION FOR 2017
January 31, 2018
Form 499 Filer ID:820078**

I, Richard Wiggins, certify:

I am President of CTC Telecom a competitive local exchange carrier (also doing business as CTC Wireless, a wireless provider and InCom, an inter-connected voip provider) serving in the State of Idaho. I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules and that I am authorized to make the following certification on behalf of CTC Telecom. I am familiar with the Federal Communications Commission's rules in Subpart U of Part 64 of Title 47 of the Code of Federal Regulations. I have personal knowledge that, as of the date of this certificate, CTC Telecom has established operating procedures that ensure compliance with the rules in Subpart U of Part 64 of Title 47 of the Code of Federal Regulations.

The subsequent statement explains CTC Telecom's procedures that have been established to comply with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules:

1) CTC Telecom has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI. CTC Telecom employees have been provided training on the CPNI rules, which include, training on carrier authentication, whether by telephone access, online access or by in store access. Employees are required to sign a compliance form stating that they have knowledge of established operating procedures. Employees are instructed that CPNI is not to be disclosed to anyone under any circumstances, unless by following the companies operating procedures in regard to the Commission's rules. Any breach of CPNI rules by an employee could result in disciplinary action which may include termination of employment.

2) Customers have been provided information on the CPNI rules and given the opportunity to opt-in or opt-out of any marketing campaign that uses CPNI however, CTC Telecom has never used CPNI for marketing purposes. Customers are given the opportunity to set up authentication, and backup authentication (without using biographical information), whether by telephone access, online access or by in store access. Customers were informed that CTC Telecom does not release or sell CPNI information to any third party.

CTC Telecom has not taken any actions in 2017, including proceedings instituted or petitions filed by CTC Telecom at either state commissions, the court system, or at the Commission, against data brokers or pretexters in the past year.

CTC Telecom has not received any customer complaints in the past year concerning the unauthorized release of CPNI such as, unauthorized access to CPNI, or unauthorized disclosure of CPNI, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.



Richard Wiggins
President
CTC Telecom, Inc.