

**Before the
Federal Communications Commission
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT
OF
TRACEROAD COMMUNICATIONS, INC.**

EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Traceroad Communications, Inc. ("Traceroad") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Traceroad:

1. I have personal knowledge that Traceroad has implemented a system by which the status of a Customer's Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Traceroad obtains written approval for the use of its customers' CPNI and that Traceroad has notified its customers of their right to restrict Traceroad's use of, disclosure of and access to their CPNI prior to obtaining such written approval. Each customer's record contains a designation identifying whether or not Traceroad has obtained, through the processes permitted by the Federal Communications Commission's ("FCC") rules, the customer's approval to use, disclose or permit access to his or her CPNI.
3. I have personal knowledge that Traceroad has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that Traceroad trains, at least once annually, its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, *et seq.* and that Traceroad has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Traceroad has implemented procedures to safeguard the disclosure of its customers' CPNI, including the following: procedures for authentication of customers before disclosing CPNI on customer-initiated telephone contacts, online access or business office visits; a customer password and backup authentication system; notification of customer account changes; and notification of security breaches of customer CPNI to law enforcement agencies. In particular, Traceroad discloses call detail information ("CDI") in a customer-initiated call only after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record. Traceroad discloses CPNI to a customer in person

at its retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

5. I have personal knowledge that Traceroad maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Traceroad retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Traceroad has established a supervisory review process regarding its compliance with the FCC's rules for outbound marketing situations and that Traceroad maintains records of such compliance for a minimum period of one (1) year. Traceroad's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Traceroad will maintain records of any discovered breaches, notices to law enforcement, and their responses, for at least two (2) years.

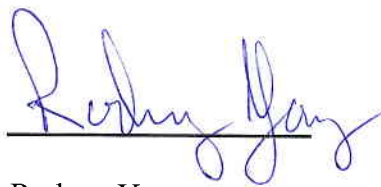
8. I have personal knowledge that Traceroad has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Traceroad, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Traceroad to enforcement action.

Executed on this 6th day of February, 2019.

TRACEROAD COMMUNICATIONS, INC.

Signed: _____



Printed: Rodney Young

Title: General Manager