

Annual 47 CFR § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year ended December 31, 2018.

1. Date filed:
2. Name of company(s) covered by this certification:
3. Form 499 Filer ID:
4. Name of signatory:
5. Title of signatory:
6. Certification:

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

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

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

The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The Company 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 _____

Attachments: Accompanying Statement explaining CPNI procedures, Explanation of actions taken against data brokers and Summary of customer complaints

Accompanying Statement explaining CPNI procedures, Explanation of actions taken against data brokers and Summary of Customer Complaints

The Company's CPNI procedures comply with 47 CFR § 64.2009-Safeguards required for use of customer proprietary network information as follows:

- (a) The Company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
- (b) The Company has trained their personnel as to when they are and are not authorized to use CPNI, and has an express disciplinary process in place.
- (c) The Company maintains a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI and a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to 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 a part of the campaign. The Company retains the record for a minimum of one year.
- (d) The Company established a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.
- (e) The Company's officer, as an agent of the carrier, who signs and file with the Commission this annual compliance certificate has personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. Furthermore, the Company is providing this statement accompanying the certificate explaining how the Company's operating procedures ensure that it is or is not in compliance with the rules in this subpart including an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This annual filing is being made with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.
- (f) The following statements explain how the Company is in compliance with the CPNI rules:
 - (1) The Company did not experience any opt-out issues requiring notification to the Commission.
 - (2) The Company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
 - (3) The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.