

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

EB Docket 06-36

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

Name of company covered by this certification: Schuylkill Mobile Fone, Inc.

Form 499 Filer ID: 804534

Name of signatory: Robert C. Green

Title of signatory: President

I, Robert C. Green, certify that I am an officer of the company named above (the “Company”), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that, to the best of my knowledge, information and belief, are adequate to ensure compliance with the Commission’s CPNI rules as I understand them. *See* 47 C.F.R. § 64.2001 *et seq.* The basis for my certification is summarized below:

The paging service provided by the Company is billed to the customer monthly, quarterly or annually without including any specific call record information in the bill. As a result, only minimal information that could be considered CPNI under the FCC’s rules is associated with a customer’s account records in the Company’s files. Any use or disclosure of or provision of access to customer-specific information by the Company, whether CPNI or not, requires my approval.

The Company uses, discloses or provides access to CPNI only for the purpose of initiating, rendering, billing or collecting for the paging service provided by the Company. There is only one circumstance under which a third-party vendor has access to CPNI as an incident of the Company providing its paging service, i.e., the vendor that physically prints the Company’s customer bills. This vendor only has access to the minimal amount of CPNI that appears in a customer’s bill; and the Company requires the vendor to observe the Company’s CPNI obligations and to limit its use of CPNI solely to the purpose for which it is permitted access. The Company also discloses CPNI to law enforcement personnel in compliance with subpoenas.

Except as described in the preceding paragraph, the Company does not disclose or provide access to CPNI to any third parties for any purpose.

With a limited exception explained hereinafter, marketing of the Company’s paging services is done through direct sales by one or more employees of the Company. Such employees may maintain a limited amount of customer account information for customer service purposes and for the purpose of selling additions to services already subscribed to by customers, or adjuncts to basic services already subscribed to by the customers. The Company also does utilize a

few third-party sales agents to solicit prospective customers. However, such third-party agents do not collect CPNI as part of their sales activities.

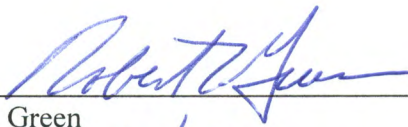
The Company has reviewed its CPNI policies and practices so as to be in compliance with the CPNI rule changes adopted by the FCC in 2007.

The Company did not take any actions against data brokers (*i.e.*, institute proceedings or file petitions at either state commissions, the court system, or at the FCC) during 2018.

The Company did not have any incidents of “pretexting” during 2018.

The Company did not receive any customer complaints during 2018 concerning the unauthorized release of CPNI.

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



Robert C. Green
Date: 2/11/19