

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018

Date filed: 2/12/2019

Name of company covered by this certification: WestPANet, Inc.

Form 499 Filer ID: 825634

Name of signatory: Thomas P. Nuhfer

Title of signatory: Owner

I, Thomas P. Nuhfer, 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 C.F.R. § 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 set forth in section 64.2001 et seq. of the Commission's rules

The company has not taken any actions against data brokers in the past year. The Company understands that it must report on any information it has with respect to the processes pretexters are using to attempt to access CPNI, and what steps the Company is taking to protect CPNI.

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

Signature: 

Statement Regarding WestPAnet, Inc.

Customer Proprietary Network Information Operating Procedures

2/12/2019

WestPAnet, Inc. provides this statement pursuant to 47 C.F.R. § 64.2009(e) to explain how WestPA.net's operating procedures ensured compliance with the Federal Communications Commission's ("FCC") Customer Proprietary Network Information ("CPNI") rules for 2018.

Customer Approval to Use, Disclose, or Permit Access to CPNI

WestPAnet, Inc. does not use, disclose or permit access to its customers' CPNI except as such use, disclosure, or access is permitted without customer approval, or as otherwise provided in Section 222 of the Communications Act of 1934, as amended, and the FCC's rules governing CPNI. Accordingly, the customer notice and associated recordkeeping requirements of the FCC's CPNI rules did not apply during the relevant period. Should WestPAnet, Inc. change its policy such that the use, disclosure, or permitted access to CPNI requires customer approval, appropriate customer notice, record-keeping, and FCC notification practices will be implemented.

Consistent with the FCC's rules, although WestPAnet, Inc. does not necessarily engage in each of the following activities, WestPA.net's policies permit it to use, disclose, or permit access to CPNI without customer approval for the purpose of:

- Providing or marketing service offerings among the categories of service to which the customer already subscribes without customer approval;
- Provisioning CPE and information service(s);
- Marketing services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., and call forwarding;
- Protecting the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services; and
- As otherwise permitted in Section 222 of the Communications Act of 1934, as amended, and the FCC's rules governing CPNI.

Notice of CPNI Rights

As explained above, WestPAnet, Inc. does not use, disclose, or permit access to its customers CPNI except as permitted without customer approval, or as otherwise provided in Section 222 of the communications Act of 1934, as amended. Therefore, WestPAnet, Inc. is not required to provide customer notice regarding CPNI rights as prescribed in the FCC's rules. Should WestPAnet, Inc. change its policies such that customer notice is required, such notice will be provided, and approval will be

obtained in a manner consistent with Section 222 of the Communications Act of 1934, as amended and the FCC's rules governing CPNI.

Record Retention for Marketing Campaigns

During the relevant period, WestPAnet, Inc. did not engage in any sales or marketing campaigns that used CPNI. Should WestPAnet, Inc. engage in such campaigns in the future, WestPAnet, Inc. will ensure compliance with the CPNI rules with respect thereto, including maintaining records of sales and marketing campaigns that use CPNI that will include (i) a description of each campaign, (ii) the specific CPNI that was used in the campaign, and (iii) what products and services were offered as a part of the campaign. WestPAnet, Inc. will maintain such records for at least one year.

Reporting Opt Out Failures

WestPAnet, Inc.'s policy is not to use, disclose, or permit access to its customers' CPNI except as permitted without customer approval under the FCC's rules or as otherwise provided in Section 222 of the Communications Act of 1934, as amended. Should WestPAnet, Inc. change its policies and seek customer approval to use, disclose, or permit access to CPNI, WestPAnet, Inc. will provide written notice of opt-out failures to the FCC within five business days as required by the FCC's rules.

Supervisor Review Process

During the relevant period, WestPAnet, Inc. did not engage in any sales or marketing campaigns that used CPNI. Should WestPAnet, Inc. engage in such campaigns in the future, WestPAnet, Inc. management will ensure that no marketing campaigns that used CPNI will occur without written approval.

Safeguarding CPNI

WestPAnet, Inc. takes the privacy and security of CPNI seriously. These procedures are designed to ensure compliance with the FCC's CPNI rules. It is WestPAnet, Inc.'s policy to take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. This applies to both residential and business customers.

Methods of Accessing CPNI:

Telephone Access - WestPAnet employs the following methods to ensure the identity of the caller and will not release information unless one of the following conditions are met:

- 1) We call the customer back at the phone number on record;
- 2) We verify their identity without using readily available biographical or account data;
- 3) We mail CPNI to the mailing address on record;
- 4) We verify a customer's identity at our in-store location.

In-Store Visit – WestPAnet will require a valid state issued driver's license or photo ID, properly identifying and matching the customer to the requested account information before any CPNI information is released.

Privacy and Security

WestPAnet is committed to the privacy and security of our customer's CPNI and as such takes reasonable steps to protect that data against unauthorized access and seeks to discover activity that is indicative of pretexting.

Breach Notification Procedures

Under the FCC's CPNI rules, WestPAnet has a duty to report any unauthorized access to CPNI. Initially, WestPAnet will alert law enforcement agencies about the breach of a customer's CPNI no later than seven (7) business days after reasonable determination that a breach occurred. WestPAnet will send electronic notification through a central reporting facility to the United States Secret Service ("USSS") and the Federal Bureau of Investigations ("FBI"). After notifying the appropriate law enforcement agencies, WestPAnet will notify the customer.

WestPAnet will maintain a record of any breaches discovered and the notifications made to law enforcement and customers for a minimum of two (2) years.

CPNI Compliance Program

As part of its CPNI compliance program, WestPAnet, Inc. provides affected employees with a "CPNI Compliance Manual" which explains CPNI and FCC rules regarding the proper use and safeguarding of CPNI. Affected employees must acknowledge that they have read and understood the CPNI Compliance Manual.

Employee Discipline

WestPAnet, Inc. has a disciplinary process in place to address noncompliance with Company policies, including policies concerning employee use of, access to, and disclosure of CPNI. An employee found to have violated WestPA.net's policies, including policies relating to the use of, access to, and disclosure of CPNI, is subject to disciplinary action.