

Annual 47 C.F.R. § 64.2010(e) CPNI Certification

EB Docket 06-36

Annual 64.2010(e) CPNI Certification for 2017

Date filed: 12 February 2018

Name of company(s) covered by this certification: Communications Venture Corporation

Form 499 Filer ID: 820280

Name of Signatory: Jonathan P Whirlledge

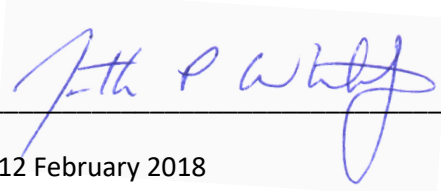
Title of Signatory: Chief Financial Officer

I, Jonathan P Whirlledge, 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 (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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI ([0] customer complaints a company has received related to unauthorized access to CPNI, or [0] unauthorized disclosures of CPNI, broken down by category or complaint, *e.g.*, [0] instances of improper access by employees, [0] instances of improper disclosure to individuals not authorized to receive the information, or [0] instances of improper access to online information by individuals not authorized to view the information).

Signed:  _____

Date: 12 February 2018

Company Name ("Carrier"): Communicatiosn Venture Corporation

Address: 1616 Directors Row, Fort Wayne, IN 46808

STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed to 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.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier'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.