

**Annual 47 CFR § 64.2009(e) CPNI Certification Template**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: February 14, 2018
2. Name of company covered by this certification: Skye Telecom LLC d/b/a Skyetel
3. Form 499 Filer ID: 831772
4. Name of signatory: Christopher Bardos
5. Title of signatory: CEO
6. Certification:

I, Christopher Bardos, 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  \_\_\_\_\_

**Attachment:** Accompanying Statement explaining CPNI procedures

## Skye Telecom LLC

### CPNI Compliance Statement

In accordance with Section 64.2009(e), Skye Telecom, LLC ("Skyetel") submits this statement summarizing how its operating procedures are designed to ensure compliance with the Commission's CPNI rules.

- (a) Skyetel has in place a "Customer Proprietary Network Information Policy" that details the policies and procedures Skyetel has implemented to safeguard customers' CPNI.
- (b) Employees are trained on the policies and procedures contained in the aforementioned CPNI Policy, as well as made aware of the disciplinary actions they would face in the event of violation of said policies and procedures.
- (c) Our annual all-hands training for 2017 took place in March 2017. Employees hired since then have been given individual training.
- (d) Skyetel employees are required to sign a non-disclosure agreement that requires them to protect all confidential information.
- (e) Skyetel utilizes CPNI for the permissible purposes enumerated in the Act and the Commission's rules, including, but not limited to, initiating, rendering, billing, and collecting for its services.
- (f) Skyetel has in place a process for verifying its customers' identity during an inbound call.
- (g) Skyetel does not use CPNI to market products or services to customers outside of the categories of service to which the customer already subscribes.
- (h) Skyetel has in place a process for notifying law enforcement, and customers if permitted, of a security breach resulting in the unauthorized access to, use or disclosure of CPNI, and will maintain a record of all such notifications.
- (i) Skyetel has in place a process for handling customer complaints regarding the disclosure of CPNI, and will keep a record of all complaints in accordance with the Commission's rules.
- (j) Skyetel has in place a process for handling requests for CPNI from law enforcement personnel and persons other than the customer.