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Annual TRS CPNI Certification

CG Docket No. 03-123

Annual Section 64.5109(e) CPNI Certification (covering calendar year 2018)

Date filed: February 14, 2019

Company name: Hamilton Relay, Inc.

Name of signatory: John Nelson

Title of signatory: President of Hamilton Relay, Inc.

I, John Nelson, 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 TRS CPNI rules. (*See 47C.F.R. § 64.5101, 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 64.5101 through 64.5111 of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

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

There have been no instances in the past year where the company, or its agents or subcontractors, used, disclosed, or permitted access to CPNI without complying with the approval procedures specified in the *TRS Customer Proprietary Network Information Rules*.

Signature: _____

Name: _____

Title: _____

Date: _____

John Nelson

President of Hamilton Relay, Inc.

2-14-19

COMPLIANCE STATEMENT

Hamilton Relay, Inc. ("*Hamilton*") is a privately owned and operated provider of various forms of Telecommunications Relay Services ("*TRS*"). Hamilton does not use CPNI to market products or services, and does not share CPNI with affiliates or third parties for their use in marketing services to its customers. Consequently, Hamilton is not required to and does not maintain either an "opt-in" or "opt-out" system with respect CPNI. Customers may subscribe to receive company newsletters, but this information is recorded at the time of subscription and not derived from CPNI.

Hamilton has developed and distributed to all employees a Compliance Manual, which contains policies and procedures to ensure compliance with the FCC's regulations including Hamilton Relay, Inc.'s CPNI policies, which prohibit Hamilton personnel from using, disclosing or accessing any relay customer's CPNI for marketing services to customers. Hamilton's Compliance Manual contains instructions for personnel on how to report noncompliance issues and contains a specific Form for employees to use to report noncompliance. In addition to the Compliance Manual, Hamilton requires all Hamilton personnel to complete annual training concerning the treatment of CPNI data prior to receiving their performance evaluation.

Hamilton uses CPNI in very limited situations, all of which are authorized by 47C.F.R§64.5105(a) & (c). Hamilton uses, discloses, or permits access to CPNI for the following reasons:

1. for the provision of CPE, and call answering, voice mail or messaging, and voice mail retrieval services;
2. to accept and handle 911 calls;
3. upon request of the TRS Fund Administrator or the Commission;
4. to protect the right or property of Hamilton, the TRS user, other TRS providers, and the TRS Fund from fraudulent, abusive, or unlawful use; and
5. to send educational messages customized by the specific category of TRS used by that customer.