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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36**

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

Date filed: February 15, 2018

Name of company covered by this certification: Sterling Communications, Inc.

Form 499 Filer ID: 802461

Name of signatory: Tom Gillihan

Title of signatory: General Manager

I, Tom Gillihan, 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 (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 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 any 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 C.F.R. § 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

your business, well connected.

**ACCOMPANYING STATEMENT**

To the best of my knowledge, Sterling Communications, Inc. ("the Company") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information.

The Company has chosen to prohibit the use or disclosure of CPNI for marketing purposes. If CPNI is to be used for its sales and marketing campaigns in the future, the required notice and opt-out approval process will be conducted as required, and safeguards will be implemented in accordance with 47 C.F.R. §64.2009.

The Company has a written CPNI Policy that explains what CPNI is, when it may be used without customer approval, and when customer approval is required prior to CPNI being used, disclosed or accessed for marketing purposes.

The Company has assigned a Director for CPNI Compliance to serve as the central point of contact regarding the Company's CPNI responsibilities and questions related to CPNI Policy. The Director for CPNI Compliance has responsibilities including, but not limited to, supervising the training of all Company employees with access to CPNI, investigating complaints of unauthorized release of CPNI, and reporting any breaches to the appropriate law enforcement agencies. The Director for CPNI Compliance also maintains records in accordance with FCC CPNI rules, including records of any discovered breaches, notifications of breaches to law enforcement, and law enforcements' responses to the notifications for a period of at least two years.

The Company has internal procedures in place to educate its employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without appropriate customer consent. Employee disclosure of CPNI is only in accordance with the law and the FCC rules. In accordance with Company Policy, any employee that uses, discloses, or permitting access to CPNI without the appropriate customer consent. Employee disclosure of CPNI is only in accordance with Company Policy, any employee that uses, discloses, or permits access to CPNI in violation of Federal regulation is subject to disciplinary action, and possible termination.

The Company requires express opt-in consent from a customer prior to the release of CPNI to a joint venture partner or independent contractor for marketing purposes. However, currently the Company does not disclose CPNI to any third party for marketing purposes.

The Company does not rely on readily available biographical information or account information to authenticate a customer's identity before a customer can access CPNI related to their telecommunications account online. Once authenticated, a customer can only obtain online access to CPNI related to his or her telecommunications account with a password that is not prompted by the Company asking for readily available biographical information, or account information.

**ACCOMPANYING STATEMENT (Continued)**

Call detail information is only disclosed over the telephone, based on customer-initiated telephone contact, if the customer first provides a password that is not prompted by the Company asking for readily available biographical information, or account information. If the customer does not provide a password, call detail information is only provided by sending it to the customer's address of record or by calling the customer at their telephone number of record. If the customer is able to provide call detail information to the Company during a customer-initiated call without the Company's assistance, then the Company is permitted to discuss the call detail information provided by the customer. Prior to the Company disclosing CPNI to a customer visiting any of its retail offices in person, the customer must present a valid photo ID matching the customer's account information. The Company has implemented procedures to notify customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, or address of record is created or changed.

The Company provides notice to the customer of their right to restrict use of disclosure of, and access to that customer's CPNI, and uses the opt-out method to solicit approval to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services in compliance with §§ 64.2007 and 64.2008. The Company is aware of the requirement that notice is to be provided to the Commission within five business days of any instances where the opt-out mechanism does not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. However, no circumstances have yet required such a notification by the Company. Supervisory approval must be obtained of any proposed outbound marketing request for customer approval.

The Company requires express opt-in consent from a customer prior to the release of CPNI to a joint venture partner or independent contractor for marketing purposes. However, currently the Company has not and does not plan to use, sell, or release CPNI to any third parties for marketing purposes which require opt-in consent.