

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 15, 2018
2. Name of company(s) covered by this certification:

Pathwayz Communications, Inc.

3. Form 499 Filer ID: 821768
4. Name of signatory: Kevin Ansley
5. Title of signatory: Vice – President

6. Certification:

I, Kevin Ansley 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 64.2001et 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. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

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 Kevin Ansley

Attachments:

Accompanying Statement explaining CPNI procedures

PATHWAYZ COMMUNICATIONS, INC.

CUSTOMER PROPRIETARY NETWORK INFORMATION (“CPNI”) PROCEDURES

The operating procedures of Pathwayz Communications, Inc. (“Pathwayz”) are designed to ensure compliance with the CPNI rules applicable to telecommunications carriers. These procedures are designed to meet Pathwayz’ duty to protect CPNI from any disclosure or use that is not permitted by the rules of the Federal Communications Commission.

- A. All disclosures or uses of Customer Proprietary Network Information (“CPNI”) are to be approved by the customer except for valid law enforcement requests. Lacking customer approval, any request to utilize CPNI requires approval of the President or Vice President to determine validity.
- B. All disclosures of CPNI for law enforcement will be listed in the CPNI notebook/file along with backup documentation maintained by the designee of the Vice President. Pathwayz does not disclose CPNI to third parties to be used for marketing purposes.
- C. All outbound marketing request campaigns must be approved by the President or Vice President. Such approval will require use of lists of customers showing the opt-in or opt-out approvals including history of notices to customers.
- D. In instances of opt-out mechanisms that do not work properly, the Vice President, and/or the President are required to notify the FCC within five (5) business days in writing. The notice shall be in the form of a letter, and shall include the carrier’s name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether the state commission(s) has taken any action, a copy of the notice provided to customers, and contact information. Such notice must be submitted even if the carrier offers other methods by which customers may opt-out.
- E. Employees will be educated on the company’s CPNI policy not to improperly disclose or use CPNI. Meetings are conducted annually, or as needed if questions arise regarding the policy.
- F. A corporate officer acting as agent for the Company will certify on an annual basis stating that the officer has personal knowledge that the Company has established the above operating procedures and that these procedures are adequate to ensure compliance with applicable CPNI rules.
- G. Employees and vendors are required to complete a disclosure agreeing to maintain the security and confidentiality of customer data (see attached).