

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 19, 2018

Name of company covered by this certification: Iowa Wireless Services, LLC d/b/a i wireless

Form 499 Filer ID: 819238

Name of signatory: J. Craven Shumaker

Title of signatory: Vice President

I, J. Craven Shumaker, certify that I am an officer of Iowa Wireless Services, LLC d/b/a **i wireless**, and acting as an agent of the company, that I have personal knowledge that **i wireless** 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 is **i wireless**' CPNI Policy and Procedures manual. The policy and procedures manual explains how **i wireless**'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. All employees receive instruction in the company's CPNI policies and are required to sign a receipt and acknowledgment statement annually.

i wireless does not sell or release CPNI to third parties for marketing purposes. **i wireless** maintains the required records of its marketing campaigns soliciting current or previous customers for services or products. **i wireless** maintains records of customers that have asked not to receive solicitations and does not contact those customers in marketing campaigns. **i wireless** has a supervisory review in place that requires all marketing and sales campaigns to be approved by a supervisor.

i wireless has not taken any actions (proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission) against data brokers in the past year. **i wireless** is not aware of any attempts of unauthorized access to CPNI by pretexters. The steps taken to protect CPNI are outlined in the attached CPNI Policy and Procedures manual.

i wireless has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: _____

J. Craven Shumaker
Vice President
Iowa Wireless Services, LLC d/b/a i wireless

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

Accompanying Statement Explaining CPNI Procedures

The Company maintains a CPNI Compliance Manual in its offices for purposes of training of new and current employees, and as a reference guide for all CPNI issues. Our CPNI Compliance Manual is updated to account for changes in law relating to CPNI. The CPNI Manual contains key all essential information and forms to ensure the Company's compliance with CPNI regulations.

The Company has chosen to prohibit the use of CPNI for marketing purposes.

In deciding whether the contemplated use of the CPNI is proper, management consults one or more of the following: the Company's own compliance manual, the applicable FCC regulations, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval regarding any proposed use of CPNI.

The Company trains its personnel for compliance with all FCC requirements for the safeguarding of CPNI, including use of passwords and authentication methods for telephone access, online access, and in-store access to CPNI, and the prevention of access to CPNI (and Call Detail Information in particular) by data brokers or pretexters." In store visits require valid photo identification.

The Company, on an ongoing basis, reviews changes in law affecting CPNI, and updates and trains company personnel accordingly.

Explanation of Actions against data brokers

The Company has not encountered any circumstances requiring it to take any action against a data broker during the year in which this Certificate pertains.

Summary of all Customer Complaints Received

The following is a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI: **None**.

The Company does not at this point have any specific information on the processes pretexters are using to attempt to access its Customer's CPNI.