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AUDIO ENGINEERING SERVICE

Division of N R Recording and Communications, Inc.

925 2ND AVE. S.W. - GREAT FALLS, MONT. 59401

AREA CODE 406 - 453-5287

February 10, 2017

Form 499 Filer ID: 000812555

DOCKET FILE COPY ORIGINAL

Marlene H. Dortch
Office of the Secretary
445 -12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

Re: CPNI Certification for 2017 Covering the Prior Calendar Year 2016
EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed herewith are an original and four (4) copies of the annual CPNI certification and accompanying statement of CPNI compliance procedures for NR Recording and Communications, Inc.

Please contact the undersigned should you have any questions regarding the submission.

Sincerely,

Robert E. Newhall
President

Enclosures

cc: Best Copy and Printing, Inc.

No. of Copies rec'd 0+4
List ABCDE

Dependable Audio Sound Installation, Design, Service, Sales and Rental
Full Stereo Commercial Recording Studios

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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 2017 covering the 2016 calendar year.

1. Date filed: February 10, 2017

2. Name of company(s) covered by this certification: NR Recording and Communications, Inc.

3. Form 499 Filer ID: 000812555

4. Name of signatory: Robert E. Newhall

5. Title of signatory: President

6. Certification:

I, Robert E. Newhall, 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, 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 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

NR RECORDING AND COMMUNICATIONS, INC.

CUSTOMER PROPRIETARY NETWORK INFORMATION

COMPLIANCE PROCEDURES

NR Recording and Communications, Inc. ("NR"), based in Great Falls, Montana, is a purveyor of commercial mobile radio service. Specifically, in that capacity, NR offers 2-way radio and one-way digital paging service to local customers. NR has established the following procedures for ensuring compliance with the FCC's rules concerning use of customer proprietary network information ("CPNI"), 47 C.F.R. § 64.2001 *et seq.*

1. NR will only use, disclose, or permit access to CPNI as authorized by 47 C.F.R. § 64.2005(a). Such permitted uses may include for providing or marketing service offerings within the categories of service to which the customer already subscribes. NR does not disclose CPNI to, nor permit access to CPNI by, any affiliate or third party, nor does it engage in any sales or marketing campaigns that involve a third party's use of or access to CPNI. If in the future NR were to engage in any sales or marketing campaigns involving a third party's use of or access to CPNI, it would comply in all respects with the notification, approval, review, reporting, and recording requirements described in 47 C.F.R. §§ 64.2007 through 64.2011.

2. Under no circumstances will NR provide any CPNI to any party over the telephone or online. All requests for CPNI must be made in person at NR'S place of business. Before furnishing any CPNI to a party who requests it in person, NR will validate that the person requesting the information is indeed the customer to whom the CPNI relates by requiring such person (i) to present a valid photo ID that matches the customer's account information and (ii) to confirm his or her last four digits of his or her driver's license, and the Channel Access Protocol (CAP) code associated with the customer's 2-way radio or pager unit. The person requesting CPNI must also provide his or her 2-way radio or pager unit to NR for purposes of confirming the CAP code. A person must furnish all such information before NR will release any CPNI to that individual. In addition, the person making the CPNI request must sign a disclosure statement, and NR will compare the person's signature to the customer's signature that is on file with NR.

3. Whenever an NR customer changes his or her address of record, the customer must sign an acknowledgement of such request for change of address. NR will immediately notify the customer by mail whenever an address of record is created or changed, as required by 47 C.F.R. § 64.2010, by mailing that notification to the customer's then current address of record. In addition, NR calls any customer who has changed his or her address at least ten days before sending mail to the new address of record to further confirm the accuracy of the new address (but in no event will NR send mail to the new address of record for at least thirty days after the customer has notified NR of an address change).

4. NR fully understands that a CPNI breach is deemed by the FCC to be an intentional gaining of access to, use, or unauthorized disclosure of CPNI. Consequently, NR's policy is that in the event of a CPNI breach, NR will, in accordance with 47 C.F.R. § 64.2011(b), electronically notify within seven (7) business days after a reasonable determination of such breach the United States Secret Service and the Federal Bureau of Investigation through a central reporting facility that may be accessed at http://www.fcc.gov/eb/cpni. NR also recognizes that it may not notify the customer or disclose such breach to the public until seven (7) full business days have passed following NR's notification of the Secret Service and the FBI of that CPNI breach.

5. For a minimum of two (2) years thereafter, NR shall maintain electronically or otherwise a record of :

(i) any CPNI breaches it discovers;

(ii) any notifications or CPNI breaches it provides to the Secret Service and the FBI;

(iii) any notifications of CPNI breaches it furnishes to customers;

(iv) the dates of such discoveries and notifications;

(v) detailed descriptions of the CPNI that was breached; and

(vi) the circumstances of each such breach.

6. Currently, the President of NR, Robert E. Newhall, is the only company representative authorized by NR to handle CPNI requests. Mr. Newhall is fully familiar with the requirements and restrictions imposed by the FCC's CPNI regulations set forth in 47 C.F.R. § 64.2001 *et seq.* In the event that any other individuals employed by NR may be called upon in the future by NR to handle requests for access to CPNI, such individuals will first receive all requisite CPNI training and be given a copy of the provisions of 47 C.F.R. § 64.2001-64.2011 to which they can easily refer. NR maintains written confirmation of such CPNI training, and has established disciplinary procedures for unauthorized CPNI use, as required by 47 C.F.R. § 64.2009 (b). Since at present Mr. Newhall is the only NR employee authorized to handle CPNI requests, any violation by Mr. Newhall of the CPNI requirements will subject him to disciplinary action by NR's board of directors in accordance with NR's established disciplinary policies. Should other employees of NR in the future be required by the company to handle CPNI requests, were they to commit a CPNI violation, they would be subject to NR's disciplinary action as well.