

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

Annual 64.2009(e) CPNI Certification: **for 2019 covering the prior calendar year 2018**

Date filed: **02/22/2019**

Name of company(s) covered by this certification: **Arkwest Communications, Inc.**

Form 499 Filer ID: **809688**

Name of signatory: **P.T. Sanders**

Title of signatory: **President & GM**

I, **P.T. Sanders**, 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: \_\_\_\_\_



**P.T. SANDERS, President & GM**

**Attachment:** Accompanying Statement explaining CPNI procedures

Statement of CPNI Compliance Procedures  
For Calendar Year 2018  
**Arkwest Communications, Inc**  
**Form 499 Filer ID 809688**

This statement serves to explain how Arkwest Communications, Inc. ("Company") is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "Customer Proprietary Network Information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§64.2000-2011).

*All subsequent references to rule Sections refer to rules under Part 65, Subpart U unless indicated otherwise.*

**1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1937 as amended (47 U.S.C. §222(f)(1)).

**2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained its employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

**3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

**5. Customer Notification and Authorization Process**

The Company does not use CPNI for marketing and thus, at this time, has not provided notices regarding the Opt-Out process. Prior to any planned use of CPNI for marketing purposes, the Company will initiate the notification and Opt-Out process. The company does not provide CPNI to other parties, and thus has not used the opt-in approval process. The Company will train its employees regarding the need and /or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and regarding approval requirements under Section 64.2008.

**6. Record of Customer CPNI Approval/Non-Approval**

At such time as the Company may initiate the use of CPNI for marketing with the corresponding initiation of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible records as to whether and how a customer has responded to Opt-Out approval, as required by Section 64.2009(a).

**7. Procedures Protecting Against Disclosure of CPNI**

The Company has implemented procedures for compliance with Section 64.2010 including, but not limited to the following:

The authentication of customers prior to disclosing CPNI on customer-initiated telephone contracts or business offices visits.

The Company has implemented procedures to notify customers of account changes.

**8. Actions Taken Against Data Brokers**

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable. There were no customer complaints regarding data-brokers received in 2015.

**9. Disciplinary Process**

The Company has an express disciplinary process in place to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

**10. Supervisory Review Process for Outbound Marketing**

At this time, the Company does not engage in any outbound marketing programs. If at any time the company determines that it will engage in outbound marketing, it will establish a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009(c) and (d). Prior to any outbound marketing effort, sales personnel will obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts will be limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, the CPNI of customers having given the Company prior approval. The Company will maintain records of its compliance for a minimum of one year.

**11. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.