

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date filed: February 22, 2018

Name of company covered by this certification: Westel Inc

Form 499 Filer ID: 808840

Name of signatory: Brian Bothroyd

Title of signatory: Vice President

I, Brian Bothroyd, 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year..

The company does not have information with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

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 is punishable under title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Name: Brian Bothroyd

Office: Vice President

Carrier: Westel, Inc.

Company Name ("Carrier"):Westel Inc.

Address: 12015 Park Thirty-Five Circle Suite 1208, Austin Texas, 78753

STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations.
- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Carrier took no actions against data brokers in 2017, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission.

- The Carrier provides no electronic or online access to its customer(s) CPNI.
- The following is a summary of all customer complaints received in 2017 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2017 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: 0
 - Category of complaint:
 - N/A Number of instances of improper access by employees
 - N/A Number of instances of improper disclosure to individuals not authorized to receive the information
 - N/A Number of instances of improper access to online information by individuals not authorized to view the information
 - N/A Number of other instances of improper access or disclosure