

UniTel, Inc. & UniCap, Inc.

PO Box 165, Unity, ME 04988 207-948-3900

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

1. Date filed: February 22, 2019
2. Name of company(s) covered by this certification: UniTel, Inc. & UniCap, Inc.
3. Form 499 Filer ID: 808898 & 825446
4. Name of signatory: Laurie L. Osgood
5. Title of signatory: President & CEO
6. Certification:

I, Laurie L. Osgood, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

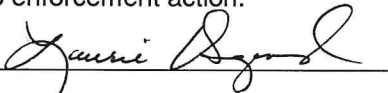
Attached to this certification is an accompanying statement explaining how the companies procedures ensure that the companies are in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have 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 companies have not received customer complaints in the past year concerning the unauthorized release of CPNI.

The companies represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The companies also acknowledge 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



Attachments: Accompanying Statement explaining CPNI procedures

UniTel, Inc. & UniCap, Inc.

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Attachment A

**Statement Concerning Procedures Ensuring Compliance with CPNI Rules
February 22, 2019**

The operating procedures of UniTel, Inc. & UniCap, Inc. (Form 499 Filer ID No. 808898 & 825446) (the "Companies") ensure that the Companies comply with Part 64, Section 2001 *et.seq.* of the FCC rules governing the use of Customer Proprietary Network Information ("CPNI").

As of this date, the Companies have not used nor plan to use CPNI for marketing. For marketing purposes, the Companies use non-CPNI information for marketing efforts without any disaggregation or refinement based on CPNI. Before undertaking to use CPNI for outbound marketing purposes, the Companies will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's part 64, Subpart U CPNI rules. The Companies have trained employees regarding the prohibitions on use of CPNI for marketing. Prior to the initiation of any program for use of CPNI for marketing, the Companies will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

The Companies train its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them. The Companies have an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Companies CPNI Operating Procedures.

The Companies do not use CPNI for marketing and thus, at this time have not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Companies will initiate the notification and Opt-Out process. The Companies do not provide CPNI to other parties and thus have not used the opt-in approval process.

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

The Companies require that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit.

The Companies maintain a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.