

**Philip Adler**  
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February 23, 2018

Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TWA-A235  
Washington, D.C. 20554

**Re: 2017 - Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2016 covering the calendar year 2017

1. Date filed: February 23, 2018
2. Name of company) covered by this certification: Philip Adler – Proprietorship
3. Name of signatory: Philip Adler
4. Title of signatory: Proprietor

**CERTIFICATION**

I Philip Adler, hereby certify that I am the sole proprietor of commercial mobile radio stations (CMRS) that are licensed and operated under my name.

I have personally established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

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

Attached to this certification is an accompanying statement that (i) explains how my procedures ensure that the I am in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules, (ii) explains any actions taken against data brokers during the past year, (iii) summarizes all customer complaints received in the past year concerning the unauthorized release of CPNI and (iv) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI.

Philip Adler  
Sole Proprietor

February 23, 2018

31 Dilworthtown Road  
Thornton, PA 19373

## STATEMENT

1. Carrier has established operating procedures that ensure compliance with the Federal Communication Commission (“Commission”) regulations regarding the protection of customer proprietary network information (“CPNI”).
2. Carrier has implemented a system whereby the status of a customer’s CPNI approval can be determined prior to the use of CPNI.
3. 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.
4. 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.
5. 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.
6. Carrier took the following 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: **None**
7. The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and what steps carriers are being taken to protect CPNI: **No incidents of access by pretexters**
8. Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier’s retail locations or otherwise and in connection with these procedures, Carrier has established a system of passwords and back-up authentication methods which complies with the requirements of applicable Commission rules.
9. Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.

10. 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: **None**
  - Category of complaint:
    - **0** Number of instances of improper access by employees
    - **0** Number of instances of improper disclosure to individuals not authorized to receive the information
    - **0** Number of instances of improper access to online information by individuals not authorized to view the information
    - **0** Number of other instances of improper access or disclosure
  - Description of instances of customer complaints, improper access or disclosure: **None**

I 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 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.

**Philip Adler**  
**Proprietor**