

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

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017.

Date filed: February 23, 2018

Name of company covered by this certification: ImOn Communications, LLC

Form 499 Filer ID: 826586

Name of signatory: Patrice M. Carroll

Title of signatory: President and CEO

I, Patrice Carroll, certify that I am an officer of ImOn Communications, LLC, ("ImOn") and acting as an agent of ImOn, that I have personal knowledge that ImOn 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 ImOn's procedures ensure that ImOn is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

ImOn has not taken any 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 in the past year.

ImOn has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

ImOn 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.



Patrice M. Carroll, President and CEO  
ImOn Communications, LLC

Attachment: Accompanying Statement explaining CPNI procedures

IMON COMMUNICATIONS, LLC  
STATEMENT OF CPNI COMPLIANCE PROCEDURES

ImOn Communications, LLC ("ImOn" or the "Company") provides voice, video and Internet services to residential and business customers in Cedar Rapids, Hiawatha, Mt Vernon, Marion, Cedar Falls, Waverly, Coralville, and Iowa City, Iowa.

ImOn has a policy of providing regular written opt-out CPNI notices to all customers to use CPNI for marketing purposes. ImOn also provides existing customers with the ability to change or rescind their consent to the Company's use of their CPNI at any time. ImOn's CPNI notices explain the customers' CPNI rights in accordance with the FCC's CPNI rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices also provide information on how customers can choose to not receive marketing from ImOn that is based upon the Company's use of their CPNI. From time to time, ImOn may use CPNI to market communications-related services outside of those services to which a customer already subscribes but only where the customer has granted approval pursuant to instructions in the CPNI notices. ImOn maintains records of customer approval and the delivery of its CPNI notices for at least one year.

As permitted by the CPNI rules, the Company may use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of the Company, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services.

ImOn has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use or disclosure of that customer's CPNI. Specifically, the Company maintains an account management system for tracking CPNI restricted accounts - those accounts where the customer has not approved use of their CPNI for marketing purposes. ImOn representatives who market to existing customers are required to check the Company's systems to determine whether a customer has a CPNI restricted account, and if so, they must refrain from marketing to that customer.

While ImOn occasionally shares CPNI with third parties solely to provide services to its customers, ImOn does not share, sell, lease or otherwise provide CPNI to any third party for the purposes of marketing any services. ImOn maintains a record for at least one year of its sales and marketing campaigns that use customers' CPNI. ImOn has established a supervisory review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules.

All ImOn employees who have access to CPNI receive training about CPNI compliance. Specifically, all new employees are provided with CPNI training at new-hire orientation that is based upon the policies and procedures set forth in ImOn's CPNI Manual. Moreover, a summary of ImOn's CPNI policies are included in its Employee Handbook, and all employees are required to acknowledge in writing that they have read and understand the information in the Employee Handbook. All ImOn employees are required to maintain the confidentiality of all information, including CPNI that is obtained as a result of their employment by ImOn. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI are subject to discipline, which may include termination.

ImOn has in place procedures to ensure that it will provide written notice to the FCC within five business days of it becoming aware of any instance where its opt-out mechanisms do not work properly to such a degree that its customers' inability to opt-out is more than an anomaly. These procedures ensure that the notice will be in the form of a letter, and will include: (i) ImOn's name; (ii) a description of the opt-out mechanism(s) used; (iii) the problem(s) experienced; (iv) the remedy proposed and when it will be or was implemented; (v) whether the relevant state commission(s) has been notified; (vi) whether ImOn has taken any action; (vii) a copy of the notice provided to customer(s); and (viii) contact information. ImOn will submit the above letter to the FCC even if it offers other methods by which its customers may opt-out.

In the event of a CPNI breach, ImOn has implemented procedures to notify law enforcement, including the United States Secret Service and Federal Bureau of Investigation as required by the CPNI rules. After notifying law enforcement and unless directed otherwise, ImOn will notify affected customers. ImOn will maintain a record of any CPNI-related breaches for a period of at least two years.

ImOn has implemented procedures whereby it will not provide CPNI without proper customer authentication for both inbound telephone calls and online account access. Prior to disclosing CPNI to a customer, ImOn authenticates the customer's identity using a variety of methods. ImOn does not provide call detail records over the phone. Call detail records are provided to a customer's address of record (either physical address or e-mail) or to the customer by contacting them at their telephone number of record. ImOn has implemented a backup method for allowing customers to change passwords in the event that passwords are lost or forgotten that conforms to the relevant FCC rules. ImOn has implemented procedures to inform customers of change of address, e-mail and other changes to account information in a manner that conforms with the relevant FCC rules.