

**Annual CPNI Certification Pursuant to 47 C.F.R. § 64.2009(e)**  
**EB Docket No. 06-36**

Annual CPNI Certification for 2019 covering the prior calendar year 2018

Date Filed: February 25, 2019

Name of company covered by this certification: Spok, Inc.

Form 499 Filer ID: 822782

Name of Signatory: Sharon Woods Keisling

Title of Signatory: Corporate Secretary and Treasurer

I, Sharon Woods Keisling, 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.*

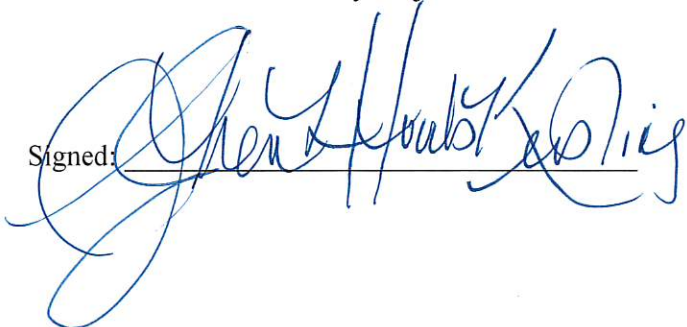
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et. seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

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

Signed: \_\_\_\_\_



### **Statement Regarding Compliance with CPNI Rules**

Spok, Inc. ("Spok") hereby explains its compliance with the Commission's CPNI rules. Spok does not use CPNI in any marketing efforts and does not disclose CPNI to any third parties except pursuant to lawful court order or subpoena. Because Spok does not use CPNI for marketing purposes, it does not seek customers' approval to do so. *See* 47 U.S.C. § 64.2009(a). Spok trains its personnel regarding the company's policy against the use or disclosure of CPNI and would discipline any employee found to violate that policy. *See id.* § 64.2009(b). Because Spok does not use CPNI for marketing, the requirement to maintain records of marketing campaigns that make use of CPNI is inapplicable. *See id.* § 64.2009(c). To the extent that Spok makes CPNI available to law enforcement agencies, pursuant to court order or subpoena, it maintains records of such disclosures. *See id.* Spok has a supervisory review process to ensure compliance with its policy prohibiting the use of CPNI in any outbound marketing campaign. *See id.* § 64.2009(d). Finally, Spok does not provide customers with access to call detail records via telephone or the Internet, but will only send such records to the customer's address of record based on a written request (and in most cases a subpoena or court order). *See id.* § 64.2010. To the extent that customers seek other forms of CPNI they may obtain account information via telephone after being properly authenticated. *See id.*