

ANNUAL 47 C.F.R. § 64.2009(e) CERTIFICATION
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior Calendar Year 2018

1. **ProPage, Inc.**
2. Date filed: February 25, 2019
3. Form 499 Filer ID: 815252
4. Name of signatory: Jeff Chalmers
5. Title of signatory: Senior Vice President & Chief Financial Officer
6. Certification

I, Jeff Chalmers, hereby certify that I am a duly authorized officer of **ProPage, Inc.**, and, acting as an agent of ProPage, Inc., that I have personal knowledge that ProPage, Inc. has established operating procedures that are adequate to ensure compliance with the rules of the Commission's CPNI rules. See § 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 in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions i.e., proceeding 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 Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Jeff Chalmers
Senior Vice President & Chief Financial Officer
ProPage, Inc.

Attachments:

Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

**STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. PART 64 SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)
FEBRUARY 25, 2019**

The following statement explains how the operating procedures of **ProPage, Inc.** ensure that it is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. Part 64 Subpart U and is relevant to the rule in effect during calendar year 2017.

To protect the proprietary and private information about our customers, ProPage, Inc. has established this company policy regarding customer information:

1. ProPage does not compile call detail information transmitted to a local paging switch, nor can it trace pages through our systems. ProPage thus does not maintain or provide call detail information of any sort. For non-call detail CPNI, ProPage authenticates the account through a standard verification process by obtaining the customer's account number and or pager number prior to proceeding with the call.
2. ProPage does not presently use, disclose, or permit access to individually identifiable CPNI in order to market services to its customers outside a customer's total services, and its policies restrict such use of CPNI for such purposes other than the marketing of CMRS and related CPE and information services. Should the company decide in the future to use, disclose, or permit access to CPNI in a manner that requires prior customer approval, we will comply with the applicable notice and consent requirements of the FCC's rules.
3. All of the company's proprietary data bases, including that containing customer information, are password protected, and access to same is limited to authorize personnel only. Distribution of the password is limited to those authorized personnel. The password will be changed routinely and whenever employees with access to such data bases leave the Company.
4. No customer information in any form is to be removed from the Company's office by employees or others. This includes computer printouts, handwritten information or notes, photocopies of files or documents or copies in any electronic form, and verbal transmission of customer information to persons who are not direct employees of the Company.
5. Employees are to closely guard customers lists, contact information, telephone numbers, mobile code lists and all other customer information, both proprietary and public, to prevent any information from being removed from our offices by non-employees, either accidentally or intentionally.
6. The notes a salesperson may make about a customer, number of pagers in use and pager numbers to assist in a sale must be returned to the Company's office and re-filed or shredded. If, for example, a salesperson is making a sales call to Customer A to discuss adding more pagers for Customer A, the sales person may need to take information on the numbers of pagers already in service at Customer A. This information is to be shared only with the customer who is using those pagers. At the completion of the sales call, the information is to be returned to the office and re-filed or shredded.

7. Internal documents, notes made when customers call in, and anything containing customer names and telephone numbers must be filed or shredded at the end of the business day.
8. Online access will be granted on a case by case basis to customers for the express purpose of equipment maintenance. No CPNI information will be available to these or any other individuals through this access. Access will be granted only through the use of the correct user name and password combination. Company access to this information will be limited to only those employees with responsibility to maintain the access system; In no circumstances will a customer's taxpayer identification number be requested. Company requests for identifying information will be limited to that sufficient to properly complete the billing process.
9. Customer information is never to be used or disclosed to anyone, except as follows:
 - (a) to market the Company's service offerings to which the customer already subscribes, and only with supervisory approval;
 - (b) to market the Company's CPE, information services, and adjunct-to-basic services and only with supervisory approval;
 - (c) to protect the Company's own rights and property, and to protect the rights of other carriers or other users of services from fraudulent, abusive or unlawful use;
 - (d) to comply with the Company's obligations to provide certain customer information when lawfully requested by law enforcement authorities pursuant to the Communications Assistance for Law Enforcement Act ("CALEA"); and
 - (e) to resolve specific customer questions about the customer's own account arising in the course of a telephone conversation between that customer and Company's service representative, and then only after orally obtaining from the customer a limited, one-time authorization to use the customer's information for the duration of that phone call.
10. Appropriate disciplinary action will be taken for any violations of this policy.
11. ProPage must provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.
 - (a) The notice shall be in the form of a letter, and shall include ProPage's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.
 - (b) Such notice must be submitted even if ProPage offers other methods by which consumers may opt-out.

ATTACHMENT

ACTIONS TAKEN AGAINST DATA BROKERS IN 2018

Forum	Description of Action(s)
Court	None
State Commissions	None
FCC	None

**SUMMARY OF CUSTOMER COMPLAINTS
CONCERNING UNAUTHORIZED RELEASE OF CPNI IN 2018**

Nature of Complaint	Total Number
Improper Access by Employees	None
Improper Disclosure to Unauthorized Individuals	None
Improper Access to Online Information by Unauthorized Individuals	None
Other	None

PRETEXTERS' ATTEMPTS TO ACCESS CPNI AND STEPS TO PROTECT CPNI FROM PRETEXTERS

ProPage, Inc. has no additional information beyond what has already been reported to the FCC and to Congress with respect to pretexters' practices. As reported in the foregoing statement, ProPage, Inc has timely achieved compliance with the FCC's rules adopted in its April 2007 Order.