

Dennis G. Kenter
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February 25, 2019

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018

Name of company/entity covered by this certification: Dennis G. Kenter

Form 499 Filer ID: 815190

Name of signatory: Dennis G. Kenter

Title of signatory: N/A – Holds license in individual capacity

I, Dennis G. Kenter, certify on my own behalf in my individual capacity,¹ that I have personal knowledge that I 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 a statement explaining how my procedures ensure that I am in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

I have not been involved or named in any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) involving data brokers in the past year.

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

Signed _____



¹ While section 64.2009(e) calls for the signature of an "officer," consistent with analogous Commission rules, as an individual I presume that my certification is sufficient for purposes of compliance with this requirement. *See, e.g.,* 47 C.F.R. § 1.10011(d)(1). To the extent the Commission deems it necessary, I hereby request a waiver of this requirement pursuant to 47 C.F.R. § 1.3 to allow me to sign the certification in my individual capacity, as is necessary under the circumstances.

DENNIS G. KENTER
Certification Statement of Compliance

Dennis G. Kenter ("DGK") provides analog one way voice paging and analog two way radio communications services. Customer records are secured in a double door locked accounting department. Computer access to all customer information is available to appropriate personnel as authorized by security protocol.

DGK currently does not use, disclose, or permit access to CPNI for marketing of any sort, or for any purpose requiring prior customer approval. Nor does DGK provide information available for sale or use by any outside company pertaining to DGK's data base of customer information. Should DGK change this policy, it will update its CPNI compliance policies consistent with Commission rules. DGK employees with access to CPNI have been trained as to when they are and are not authorized to use CPNI, and DGK has an express disciplinary process in place.

DGK properly authenticates customers prior to disclosing CPNI based on customer-initiated telephone contact or an in-store visit. As a paging provider, however, DGK does not maintain call detail information. Also, CPNI is not made available in any form online via the Internet. For in-store visits a valid photo ID is required to disclose CPNI. Customers are notified immediately when an address of record is created or changed.

All records are secured as well as any information pertaining to the customer accounts. There has been no access authorized or unauthorized by any parties to obtain any customer information, including CPNI. Nevertheless, policies are in place to ensure that law enforcement and affected customers are timely notified of a breach of its customers' CPNI as the Commission's rules require.