RADIO COMMUNICATIONS, INC.
176 Meachem Avenue • Battle Creek, Michigan 49037 • 269-963-4171 • 1-800-757-7665 • FAX 269-963-2426

February 27, 2017

STATEMENT

Radio Communications Inc. ("Carrier") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has adopted a manual and keeps it updated with FCC CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.
- 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.
- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier does not maintain a record of its and its affiliates' sales and marketing campaigns that use its customers CPNI as we do not have any customer information that pertains to CPNI. Carrier does not maintain any type of record of any instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI or any 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.
- Carrier has not established a supervisory review process regarding compliance with the CPNI rules since we do not do any type of outbound marketing situation with regard to CPNI records.
- Carrier does not have any established procedures to notify law enforcement and customer(s) of any disclosure information that pertains to CPNI information.
- Carrier took the following actions against data brokers in 2016, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: **NONE**

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- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and (if any) what steps carriers are taking to protect CPNI: **CARRIER HAS DETERMINDED THAT NO PRETEXTER HAS ATTEMPTED TO ACCESS CPNI ON CARRIER'S SYSTEM.**
- The following is a summary of all customer complaints received in 2016 regarding the unauthorized release of CPNI:
  - Number of customer complaints Carrier received in 2016 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: **NONE**
    - **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 improper access or disclosure: **NONE**

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VIA ELECTRONIC FILING
Federal Communications Commission
445 12th Street, SW Suite TW-A325
Washington DC 20554

Re: **Annual 47 C.F.R. & 64.2009(e) CPNI Certification**
Covering Calendar Year 2016
EB Docket NO. 06-36
Radio Communications Inc.
499 Filer ID: ____/FRN:0005032156

Radio Communications Inc.

I, H. Ronald Cathcart, herby 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 effective during the calendar year 2016 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.

Attached is the certification is an accompanying statement that (i) explains how the company's procedures ensure that the company is 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.

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.

H. Ronald Cathcart

Name: H. Ronald Cathcart
Title: Vice President
Date: February 27, 2017

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