March 1, 2019

Re: Annual 47 C.F.R. S: 64.2009(e) CPNI Certification**; EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for **2019**

covering the prior calendar year **2018**

1. Date filed: Feb 28 , 2019

2. Name of company(s) covered by this certification **Win.net Telecommunications, Inc. and affiliates**

3.Form 499 Filer ID: **823580**

4. Name of signatory: **Michael Tague**

5. Title of signatory: **President**

6. Certification:

I, **Michael Tague**, certify that I am an officer of the Win.Net named above, and acting as an agent of the Win.Net, that I have personal knowledge that the Win.Net has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information (“CPNI”) rules located at 47 C.F.R. §64.2001 et seq.

Attached to this certification is a compliance statement explaining how the Win.Net’s procedures ensure that it is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission’s rules.

The Win.Net has not taken actions (i.e., proceedings instituted or petitions filed by at either state commissions, the court system, or at the Commission against data brokers) in the past year. The Win.Net has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The Win.Net 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 Win.Net 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.

If any further information is required, please contact me at 502-387-6800

Sincerely,



**Michael Tague**,

**Feb 28, 2019**

CPNI Compliance Statement and Operating Procedures of **Win.Net**

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007)(“EPIC CPNI Order”),[1](" \l "sdfootnote1sym) **Michael Tague, President, of Win.Net Telecommunications, Inc.** and affiliated entities makes the following statement:

**Win.Net** has established policies and procedures to comply with the Federal Communications Commission's (“FCC”) rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that **Win.Net** is compliant with the FCC’s customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize **Win.Net’s** policies and procedures designed to safeguard CPNI.

**Win.Net** has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. **Win.Net** is engaged in training their personnel as to when they are and are not authorized to use CPNI, and **Win.Net** has an express disciplinary process in place.

**Win.Net** uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. **Win.Net** does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service. **Win.Net** has established a supervisory review process regarding its compliance with the CPNI rules regarding outbound marketing situations and maintains records for one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

**Win.Net** has established procedures to verify an incoming caller's identity. **Win.Net** trains its personnel in both the use of CPNI, and protection of its confidentiality. These procedures are detailed in **Win.Net’s** CPNI Manual. **Win.Net** also limits the number of employees that have access to customer information and call data.

**Win.Net** has implemented measures to discover and to protect against unauthorized attempts to access CPNI. **Win.Net** also has implemented procedures pursuant to which it can track breaches of CPNI, and given such an event will notify the United States Secret Service and the Federal Bureau of Investigation in accordance with the FCC’s rules. **Win.Net** will track customer complaints regarding CPNI, notify its customers in accordance with the FCC’s rules and will maintain a record of notifications to the USSS, FBI, for the time period specified in the FCC’s rules.

**Win.Net** has not taken any actions (proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Pretexters have not attempted to access **Win.Net’s** CPNI. There have been no customer complaints received in the past year concerning the unauthorized release of CPNI.

**Win.Net** annually submits a CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.



**Michael Tague**

President, Win.Net Telecommunications, Inc.