Commnet
Connecting Rural America

February 27, 2019

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Suite TW-A325
Washington, D.C. 20554

> Re: Annual 64.2009(e) CPNI Certification for 2019 covering calendar year 2018
> Form 499 Filer ID Nos.[1]
> **EB Docket No. 06-36**   .

Dear Ms. Dortch:

Pursuant to §64.2009(e) of the Commission's rules, Commnet Wireless, LLC, on behalf of itself and its various licensee subsidiaries and affiliates (*see* footnote 1, *infra*) (collectively, "Commnet"), hereby certifies that the company has established operating procedures that are adequate to ensure compliance with the rules set forth in Subpart U of Part 64 of the Commission's Rules.

Commnet has not and does not sell any customer information to any company or use such information for purposes of conducting sales and marketing campaigns. Commnet keeps all customer information and records, whether paper or electronic, in secure locations. Access to these locations and the information stored there are strictly limited.

Attached to this certification is a written policy explaining Commnet's procedures that ensure compliance with the requirements of the CPNI Rules. The written policy has been distributed to all personnel, and all personnel with access have been trained to maintain customer records as proprietary information and not to share such information with any outside parties.

Commnet did not take any actions against data brokers in the past year. Also, Commnet did not receive any customer complaints in the past year concerning unauthorized release of CPNI or experience any confirmed CPNI breaches.

I, the undersigned, certify that I am an officer of Commnet, and acting as an agent of Commnet, that I have personal knowledge that Commnet, has established operating procedures that are adequate to ensure compliance with the Commission's CPNI Rules set forth in §§64.2001 *et seq*.

Joe Moravec
President & CEO

Enclosure

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[1] Each of Commnet's subsidiaries and affiliates files its own Form 499A and, thus, each has been assigned its own Form 499 Filer ID number, which are as follows: Commnet of Arizona, LLC – No. 823492; Elbert County Wireless, LLC – No. 822200; Excomm, LLC – No. 822196; Commnet of Georgia, LLC – No. 829228; Commnet Four Corners, LLC – No. 823490; Gila County Wireless, LLC – No. 826547; Commnet Midwest, LLC – No. 827014; Mora Valley Wireless, LP – No. 827015, Commnet of Nevada, LLC – No. 827625; Commnet of Texas, LLC – 829229, Peridot Wireless, LLC – No. 828222, Tisdale Nebraska, LLC – 831450 and WestNet Nevada, LLC - 832604. All other Commnet subsidiaries and affiliates are also covered by this letter; however, the other subsidiaries had not initiated any commercial operations (wholesale or retail), as of December 31, 2018.

COMMNET WIRELESS, LLC
STATEMENT OF POLICY REGARDING CPNI

This statement of policy regarding CPNI is filed on behalf of Commnet Wireless, LLC ("Company") and its subsidiaries and/or affiliates companies listed in footnote 1 of its certification. This statement outlines the Company's policies and procedures that ensure its compliance with CPNI rules set forth in Section 222 of the Communications Act and Section 64.2001, *et seq.* of the Federal Communications Commission's rules.

Employee Training and Disciplinary Procedures

The Company has a designated employee to oversee CPNI training and implementation. Company continually educates and trains its employees on the appropriate use of customers' CPNI. Company provides mandatory annual CPNI training to all employees. Company provides mandatory CPNI training to all new employees. All employees are provided access to the Company's customer information policy that includes information about the importance of and processes for protecting CPNI. Company has established disciplinary procedures to deal with employees that violate CPNI procedures. The Company's customer information policy clearly states that breaches of CPNI procedures are grounds for disciplinary action, including dismissal, and may carry penalties under federal and state laws.

Use, Disclosure and Access to CPNI

The Company has adopted specific CPNI policies and procedures to ensure that CPNI is only used, disclosed or accessed to provide or market services among the categories of service to which the customer already subscribes except as permitted by Section 222(d) of the Act and Section 64.2005 of the Commission's rules. If the Company uses CPNI for a marketing campaign, it will maintain a record of such sales and marketing campaigns. The records will consist of a description of the campaign, the specific CPNI that was used in the campaign and the products and services that were offered in that campaign. Company will implement a system to obtain prior approval and informed consent from its customers before CPNI is used for sales and marketing campaigns outside the categories of service to which the customer already subscribes. The system will allow for a customer's opt-in/opt-out status to be clearly established prior to the use of CPNI.

Use of CPNI in Sales and Marketing Campaigns

Prior to commencement of a sales and marketing campaign that utilizes CPNI, outside the categories of service to which a customer subscribes, the Company will implement a customer opt-in (approval)/opt-out status (disapproval) system consistent with Section 64.2007 of the Commission's rules. Company will ensure a customer's approval or disapproval remains in effect until the customer revokes or limits the approval or disapproval. Company will maintain a record of such CPNI approval or disapproval for a minimum of one year. All notices sent to customers will comply with and contain the disclosures required in Section 64.2008 of the Commission's rules.

Safeguards Required for Use, Disclosure, or Access to CPNI

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the use of reasonable and proper authentication

processes to identify a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access or an in-store visit. Company has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, electronically or at retail locations. The Company has implemented a system of passwords and back-up authentication methods for all customer accounts in compliance with the Commission's Rules. Additionally, Company policies prohibit a service representative from disclosing call detail information over the phone based on a customer-initiated telephone contact. Customer may only access call detail records via online account access or by mail to the current billing address associated with the account. Finally, Company policies require a customer to provide a photo ID to obtain access to CPNI/call detail information at retail store locations.

The Company will implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Company will also establish a supervisory review process regarding compliance with CPNI rules with respect to outbound marketing situations and maintain records of its compliance for a minimum period of one-year. Finally, the Company will provide written notice to the Commission, within 5 days business days, of any instance where the opt-in/opt-out mechanisms do not function properly or to a degree that customers' inability to opt-in/opt-out is more than an anomaly.

The Company has established processes for notifying customers of certain account changes as required by Section 64.2010(f) of the Commission's rules.

Notification of CPNI Security Breaches
The Company has policies and procedures in place to ensure compliance with Section 64.2011 of the Commission's rules. All employees are directed to notify the Company's ethics hotline if they reasonably believe that a CPNI breach has occurred. Company will notify law enforcement and its customers of any breach in accordance with the rule, and a record of the breach will be maintained for two years.