

Annual 47 CFR § 64.2009(e) CPNI Certification Template  
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: 2/28/18
2. Name of company(s) covered by this certification: Computer Office Solutions Inc
3. Form 499 Filer ID: 827787
4. Name of signatory: Frank D Aquino
5. Title of signatory: Vice President
6. Certification:

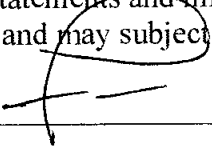
I, Frank D Aquino, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.  
See 47 CFR § 64.2001 et seq.

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

The company has not taken actions (i.e., proceedings 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 customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 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.

Signed  [Signature of an officer, as agent of the carrier]

Attachments: Accompanying Statement explaining CPNI procedures

2017 CPNI Compliance Statement and Operating Procedures of  
Computer Office Solutions, Inc.

Computer Office Solutions, Inc. 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 Computer Office Solutions, Inc., otherwise known as the Company, is compliant with the FCC's customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize the Company's policies and procedures designed to safeguard CPNI.

The Company 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. The Company does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

The Company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

The Company trains its personnel as to when they are and are not authorized to use CPNI, and has an express disciplinary process in place.

The Company shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use the customers' CPNI. The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include 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. The Company shall retain the record for a minimum of one year.

The Company has established a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintains records of compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

The Company will provide written notice within five business days to the Commission 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.

- (1) The notice shall be in the form of a letter, and shall include the carrier'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.
- (2) Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.