

RPA Management, LLC
550 W Pacific Street
Blackfoot, ID 83221

VIA ELECTRONIC FILING

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


Re: **Annual 47 C.F.R. § 64.2009(e) CPNI Certification
Covering Calendar Year 2017
EB Docket No. 06-36
RPA Management, LLC
FRN 00057669245**

CERTIFICATION

I, Aaron Clark, hereby 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 2017 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 to this certification is an accompanying statement that (i) explains 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 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.



Name: Aaron Clark
Title: Member
Date: February 27, 2018

- Carrier took the following actions against data brokers in 2017, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: None
- 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 determined that no pretexter has attempted to access CPNI on Carrier's system. Employees are trained to be diligent with CPNI and assure identification.
- The following is a summary of all customer complaints received in 2017 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2017 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: None
 - Category of complaint:
 - 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