



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

March 1, 2019
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

**RE: Inland Development Corporation
EB Docket No. 06-36; CPNI Certification CY 2018**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Windwave Technologies, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant

Enclosures
ST/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification: Covering calendar year 2018

Name of company(s) covered by this certification: Inland Development Corporation

Form 499 Filer ID: 825334

Name of signatory: Lynn Rodriguez

Title of signatory: Chief Financial Officer

1. I, Lynn Rodriguez, 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 C.F.R. §64.2001 *et seq.*
2. 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, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. 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.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. 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.



Lynn Rodriguez, Chief Financial Officer

3/1/19

Date

Attachments: Accompanying Statement explaining CPNI procedures

Inland Development Corporation

Statement of CPNI Procedures and Compliance

Inland Development Corporation ("Inland") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Should Inland elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Inland provides exclusively dedicated non-voice services that do not involve call detail information. Consequently, the CPNI rules related to protection of call detail are not applicable. In the event that Inland provides services in the future that generate associated call detail information, Inland understands its obligation to protect that information, and will implement appropriate policies and procedures to ensure compliance with the FCC rules.

Inland understands its obligation to notify law enforcement in the event of a breach of customer's CPNI. If Inland in the future provides any services that generate call detail information that could be subject to possible disclosure, it will implement appropriate policies and procedures to ensure compliance with the FCC rules with respect to law enforcement and customer notification of such breaches.