

March 1, 2019

FILED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

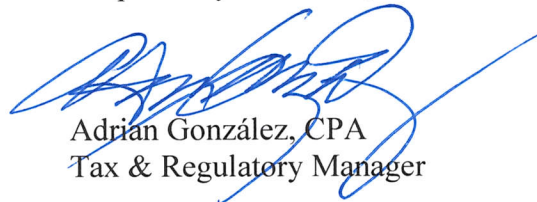
**Re: PRWireless PR, LLC.
2018 Annual CPNI Certification
EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §§64.2009(e); enclosed please find the accompanying annual CPNI certification and statement for calendar year 2018 for PRWireless PR, LLC, Form 499 filer ID 826742.

Please do not hesitate to contact me if you have any questions at 787.554.6736 ext. 1012.

Respectfully submitted,


Adrian González, CPA
Tax & Regulatory Manager

Enclosures

Annual 47 C.F.R. §64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification covering calendar year 2018

1. Date filed: **March 1, 2019**
2. Name of company covered by this certification: **PRWireless PR, LLC**
3. Form 499 Filer ID: **826742**
4. Name of signatory: **Stephan Termaat**
5. Title of Signatory: **Chief Financial Officer (CFO)**
6. Certification:

I, **Stephan Termaat**, 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.*

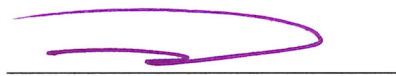
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001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

The company **has not** taken any 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 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.

Signed



Attachments: Accompanying Statement explaining CPNI procedures

Attachment 1

Statement attached to made part of the
Annual 47 C.F.R. §64.2009(e) CPNI Certification of
PRWireless PR, LLC

CPNI Procedures

PRWireless PR, LLC has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

PRWireless PR, LLC is a provider of Commercial Mobile Radio Service ("CMRS") and does not offer telecommunications service to its customers in categories other than CMRS. PRWireless PR, LLC does not currently use customer proprietary network information ("CPNI") for the purpose of marketing services other than CMRS, customer premises equipment, and information services to its customers. Nor does PRWireless PR, LLC share CPNI with third parties, unless requested by duly authorized law enforcement officials. Consequently, PRWireless PR, LLC is not required to maintain either an "opt-in" or "opt-out" system with respect to CPNI. In the event that PRWireless PR, LLC were to change the ways in which it uses CPNI, any such change would be reviewed and approved by the company's Chief Operations Officer, who is familiar with the FCC's rules governing the use of CPNI and who is the certifying officer for CPNI purposes.

PRWireless PR, LLC has established procedures to protect its customers sensitive information. PRWireless PR, LLC maintains all CPNI on a secure server, and CPNI is only accessible through a custom reporting tool available only to specially-trained employees at corporate headquarters and in the field. PRWireless PR, LLC has established procedures to ensure employees with access to CPNI handle this information properly and according to the FCC's CPNI rules. All

employees with access to CPNI are trained on what constitutes authorized versus non-authorized CPNI disclosure. Procedures in place include express disciplinary actions for the unauthorized use of CPNI.

PRWireless PR, LLC offers two different services to customers, each of which requires a distinct approach to the application of CPNI requirements. One service model offers service to customers via a prepaid billing similar to that of MetroPCS (representing over 99 percent of PRWireless PR, LLC's customer base), while the other service model offers service to customers via a traditional postpaid billing (representing the remaining customers, who account for less than 1 percent of its customer base).

PRWireless PR, LLC does not offer its prepaid customers the ability to access call detail information by telephone or over the Internet. Call detail information is released to prepaid customers only by presenting a written request in person, including the presentation of valid identification and the customer password. However, the company allows for a limited exception to these procedures in connection with the release of CPNI to law enforcement personnel only upon presentation of a valid subpoena or court order. PRWireless PR, LLC provides non-call detail related CPNI to its prepaid customers via the Internet only after the customer provides a valid user ID and password.

For the small percentage of PRWireless PR, LLC's customers subscribed to postpaid service, PRWireless PR, LLC provides call detail CPNI only in the following circumstances: (1) an in-person request with the presentation of valid identification; (2) a request via the Internet and the customer's provision of the correct password; or (3) a request by telephone, in which case the records are mailed to the customer's mailing address of record. In the event that a subscriber requesting CPNI over the Internet cannot supply a valid password, CPNI will be released only upon the presentation of unique identifying information establishing that the requesting party is, in fact, the subscriber whose records

are requested. In such circumstances, a customer's online password is reset by e-mail confirmation to the customer's e-mail address of record. However, the company allows for a limited exception to these procedures in connection with the release of CPNI to law enforcement personnel only upon presentation of a valid subpoena or court order.