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WASHINGTON, DC 20006

February 28, 2019

**SUBMITTED ELECTRONICALLY VIA ECFS**

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

Re: Annual 64.2009(e) CPNI Certification for 2019,  
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Education Networks of America, Inc. (ENA) and pursuant to 47 C.F.R. § 64.2009(e), enclosed is ENA's CPNI Certification for 2019, covering the prior calendar year 2018. ENA's Form 499 filer ID is 826269.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

A handwritten signature in black ink that reads "Gina Spade".

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**CERTIFICATE OF CPNI COMPLIANCE FOR CALENDAR YEAR 2018**  
**EB DOCKET 06-36**

I, Kitty Ganier, certify that I am an officer of Education Networks of America, Inc. ("Company"), 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (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 any 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.

  
\_\_\_\_\_  
Kitty Ganier  
General Counsel

\_\_\_\_\_  
2-28-2019  
Date

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**STATEMENT CONCERNING PROCEDURES ENSURING  
COMPLIANCE WITH CPNI REGULATIONS  
FOR CALENDAR YEAR 2018**

The operating procedures of Education Networks of America, Inc. ("ENA" or "Company") are adequate to ensure that the Company complies with Part 64, Section 2001 *et. seq.* of FCC rules governing the use of CPNI.

Compliance with the FCC's CPNI rules is ensured by the fact that ENA has established an internal policy limiting the use or disclosure of CPNI to very limited circumstances. Furthermore, the Company trains employees on the limitations of use or disclosure of CPNI as governed by federal law and Company policy.

The Company's policy establishes the following parameters regarding the use or disclosure of CPNI:

- 1) ENA does not use, disclose or permit access to CPNI for marketing purposes.
- 2) ENA will not release or disclose CPNI to a third party, except as follows: ENA will only release or disclose CPNI to a third party pursuant to (A) a valid request from law enforcement, the federal judiciary or other appropriate governmental authority (*e.g.*, CPNI will only be disclosed after the requesting party demonstrates that the request is made pursuant to a valid subpoena, court order, search warrant or letter from a national security agency) or (B) express customer approval to release or disclose the customer's CPNI to a third party.
- 3) ENA has implemented customer authentication protocols that are compliant with the FCC's requirements. Appropriate passwords must be provided before CPNI is released. If passwords are not available, other methods compliant with the FCC's requirements are utilized to authenticate the requestor before such information is released.
- 4) ENA maintains a record, for a period of at least one year, of those limited circumstances in which CPNI is disclosed or provided to third parties (pursuant to a valid request from law enforcement, the federal judiciary, other appropriate governmental authority, or express customer consent).
- 5) Violations of the FCC's CPNI rules or the Company's CPNI policy may result in disciplinary action, including the termination of employment where appropriate.