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

EB Docket 06-36

Annual 64.209(e) CPNI Certification for 2018

Date Filed: March 1, 2019

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Name of Signatory: James D. Pennington, Sr.

Title of Signatory: Owner

I, James D. Pennington, Sr., 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. S 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 any unauthorized release of CPNI.

Signed: James D. Pennington, Sr.