

March 1, 2019

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year of 2018

1. Date filed: March 1, 2019
2. Name of company(s) covered by this certification: Stowe Communications, LLC
3. Form 499 Filer ID: 830989
4. Name of signatory: Frederick R. Rothhammer
5. Title of signatory: President
6. Certification: I, Frederick R. Rothhammer, 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 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 *Frederick Rothhammer*

Frederick R. Rothhammer
President, Stowe Communications, LLC

Attachments: Accompanying Statement explaining CPNI procedures

Stowe Communications, LLC CPNI Procedures

Stowe Communications, LLC (“Stowe Communications”) has implemented the following safeguards to ensure compliance with the CPNI rules of the Federal Communications Commission, 47 C.F.R. 64.2001 *et seq*;

(a) As an initial matter, Stowe Communications generally does not use CPNI for marketing purposes or for any other reason for which customer approval would be required under 47 C.F.R. § 64.2007(b). Because Stowe Communications does not allow the use of CPNI for any reasons for which either opt-in or opt-out approval is required, such approval is not requested and all customers are treated as not providing such approval. Accordingly, Stowe Communications has implemented a system by which the status of a customer’s CPNI approval can be clearly established prior to the use of CPNI.

(b) All Stowe Communications personnel have been informed of when they are and are not authorized to use CPNI. Specifically, all Stowe Communications personnel have been informed that CPNI is not to be used for marketing purpose and that CPNI should not be provided to third parties except as required by law and when approved by a supervisor. In addition, all employees have been informed that disciplinary action would result from violating company policy regarding CPNI.

(c) Stowe Communications and its affiliates do not use CPNI for sales and marketing campaigns. Stowe Communications does not disclose or provide CPNI to third parties, or allow access to CPNI by third parties, except as required by law. Stowe Communications maintains records of all instances where CPNI was disclosed or provided to third parties.

(d) No marketing campaigns that used CPNI were conducted in 2018. A supervisory review process is in place to ensure compliance with the Commission’s rules for outbound marketing situations. Specifically, any proposed outbound marketing campaign, whether involving CPNI or not, would have to obtain supervisory approval.

(e) Stowe Communications takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. If Stowe Communications were to reasonably determine that a breach has occurred, Stowe Communications would provide timely notice of such breach to the United State Secret Service, the Federal Bureau of Investigation, and the customer, if permitted, in accordance with 47 C.F.R. § 64.2011 and appropriate records maintained.