



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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: March 1, 2018
2. Name of company(s) covered by this certification: Hunter Communications
3. Form 499 Filer ID: 825475
4. Name of signatory: Richard W. Ryan
5. Title of signatory: President/CEO
6. Certification:

I, Richard W. Ryan 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 any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

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  Richard W. Ryan

Attachments: Accompanying Statement explaining CPNI procedures
 Explanation of actions taken against data brokers (if applicable)
 Summary of customer complaints (if applicable)



Accompanying Statement to Annual CPNI Compliance Certification for

Hunter Communications

In compliance with 47 C.F.R. § 64.2001 *et seq.* I, Richard W. Ryan, acting on behalf of Hunter Communications certify the Company has taken the following actions:

Employee Training and Discipline:

- Trained all employees and personnel as to when they are and are not authorized to use CPNI.
- Instituted an express disciplinary process for unauthorized use of CPNI.

Sales and Marketing Campaign Approval:

- Guaranteed that all sales and marketing campaigns are approved by management.

Record-Keeping Requirements

- Established a system to maintain a record of all sales and marketing campaigns that use their customers' CPNI, including marketing campaigns affiliates and independent contractors.
- Designed its customer service records in such a manner that the status of a customer's CPNI approval can be clearly established.
- Ensured that these records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Made certain these records are maintained for a minimum of one (1) year.

Establishment of a Supervisory Review Process

- Established a supervisory review process for all outbound marketing situations.
- Certified that under this review process, all sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval.

Opt-In

- Guaranteed that the Company only discloses CPNI to agents, affiliates, joint venture partners, independent contractors or to any other third parties only after receiving "Opt-In" approval from a customer.
- Verified that the Company enters into confidential agreements with joint venture partners, independent contractors or any other third party when releasing CPNI.

Opt-Out Mechanism Failure

- Established a protocol through which the Company will provide the FCC with written notice within



five (5) business days of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Compliance Certificates

- Executed a statement, signed by an officer, certifying that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the FCC's CPNI regulations.
- Executed a statement detailing how operating procedures ensure compliance with CPNI regulations.
- Executed a summary of all customer complaints received in the past year concerning unauthorized release of CPNI.

Customer Authentication Methods

- Instituted customer authentication methods to ensure adequate protections of customers CPNI. These protections only allow CPNI disclosure in accordance with the following methods:
 - Disclosure of CPNI information in response to a customer providing a pre-established password;
 - Disclosure of requested CPNI to the customer's address or phone number of record.

Customer Notification of CPNI Changes

- Established a system under which a customer is notified of any change to CPNI. This system, at minimum, notifies a customer of CPNI access in the following circumstances:
 - Password modification,
 - A response to a carrier-designed back-up means of authentication
 - Address of record change or creation.

Notification of Law Enforcement and Customers of Unauthorized Access

- Established a protocol under which the appropriate Law Enforcement Agency ("LEA") is notified of any unauthorized access to a customer's CPNI.
- Ensured that all records of any discovered CPNI breaches are kept for a minimum of two (2) years.



Summary of Actions Taken Against Databrokers by

Hunter Communications

In compliance with 47 C.F.R. § 64.2001 *et seq.* I, Richard W. Ryan, acting on behalf of Hunter Communications, summarize the actions that the Company has taken against data brokers within the last year:

Detailed list of "any actions" taken against pretexters or databrokers.

The term "any actions," means: proceedings instituted or petitions filed by a carrier at either state commissions, the court system, or the Federal Communications Commission against databrokers.

For Example:

- 1) On October 11, 2007, "ABC Company" filed a complaint in the Federal District Court of New Jersey against "John Doe" for attempting to obtain customers' CPNI information through "fraud, trickery and deceit." This case is entitled ABC Company vs John Doe, Case No. 07-12345-67.

No such actions taken against databrokers within the last year.



Summary of Customer Complaints Received by

Hunter Communications

In compliance with 47 C.F.R. § 64.2001 *et seq.* I, Richard W. Ryan, acting on behalf of Hunter Communications, provide a summary of customer complaints received within the last year:

- The Company has not received any complaints as a result of improper access by employees.
- The Company has not received any complaints as a result of improper disclosure to individuals not authorized to receive the information.
- The Company has not received any instances of improper access to online information by individuals not authorized to view the information.

No such complaints have been received.