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March 1, 2018

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W., Suite TW-A325  
Washington, DC 20554

**RE: Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
Covering Calendar Year 2017  
EB Docket No. 06-36  
Steven J. Guller  
FRN: 00019646421**

Dear Ms. Dortch:

Steven J. Guller, by his attorneys and pursuant to Section 64.2009(e) of the Commission's rules, hereby submits its 2017 CPNI Certification and Accompanying Statement.

If there are any questions regarding this submission, please contact the undersigned.

Very truly yours,



Katherine Patsas Nevitt

Enclosures

cc: Best Copy and Printing, Inc.

STEVEN J. GULLER  
1340 BAUR BOULEVARD  
ST. LOUIS, MISSOURI

**VIA ELECTRONIC FILING**

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Federal Communications Commission  
445 12<sup>th</sup> Street, SW Suite TW-A325  
Washington, D.C. 20554

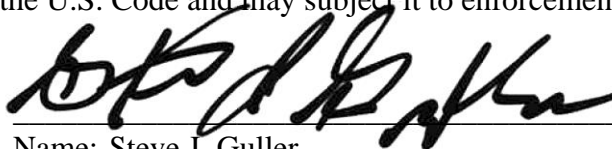
Re: **Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
Covering Calendar Year 2017  
EB Docket No. 06-36  
Steven J. Guller  
FRN: 00019646421**

**CERTIFICATION**

I, Steven J. Guller, hereby certify that I am the individual named above and I have personal knowledge that I have established operating procedures effective during the calendar year 2017 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement that (i) explains how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules, (ii) explains any actions taken against data brokers during the past year, (iii) summarizes all customer complaints received in the past year concerning the unauthorized release of CPNI and (iv) reports information known to the company regarding tactics pretexters may be using to attempt access to 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.



Name: Steve J. Guller

Title: Licensee

Date: March 1, 2018

## STATEMENT

Steven J. Guller (“Carrier”) has established operating procedures that ensure compliance with the Federal Communication Commission (“Commission”) regulations regarding the protection of customer proprietary network information (“CPNI”).

- Carrier has adopted a manual and keeps it updated with FCC CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI, specifically outlining when they are and are not allowed to use CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier has implemented a system whereby the status of a customer’s CPNI approval can be determined prior to the use of CPNI.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes 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. These records are maintained for a minimum of one year.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier’s sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier’s retail locations, electronically or otherwise.
- Carrier understands and is prepared to provide written notice to the FCC within five (5) business days of any instance where the opt-out mechanisms do not work properly and is more than an anomaly.
- Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.

- Carrier took the following actions against data brokers in 2017, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: **None**
- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: **Carrier has determined that no pretexter has attempted to access CPNI on Carrier's system. Employees are trained to be diligent with CPNI and assure identification.**
- The following is a summary of all customer complaints received in 2017 regarding the unauthorized release of CPNI:
  - Number of customer complaints Carrier received in 2017 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: **None**
  - Category of complaint:
    - **0** Number of instances of improper access by employees
    - **0** Number of instances of improper disclosure to individuals not authorized to receive the information
    - **0** Number of instances of improper access to online information by individuals not authorized to view the information
    - **0** Number of other instances of improper access or disclosure
  - Description of instances of improper access or disclosure: **None**