



Date: March 1, 2018

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

RE: Certification of CPNI Filing, March 1, 2018  
EB Docket 06-36  
ALLO Communications

Please find attached ALLO Communications' annual compliance certificate for the most recent period, as required by section 64.2009(e) of the Commission's Rules, together with a statement of how its operating procedures ensure that it is or is not in compliance with the rules (Attachment A), an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI).

Should you have any questions regarding this filing, please direct them to the undersigned at (308) 633-7805 or email [aoneil@allophone.net](mailto:aoneil@allophone.net).

Sincerely,

\_\_\_\_\_  
Allison O'Neil  
Vice President of Customer Operations  
ALLO Communications

Cc: Enforcement Bureau, Telecommunications Consumers Division (2)

Best Copy and Printing, Inc. (1)

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2017

Date filed: March 1, 2018

Name of company covered by this certification: ALLO Communications

Form 499 Filer ID: 824034

Name of signatory: Allison O'Neil

Title of signatory: Vice President of Customer Operations

I, Allison O'Neil, 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 set forth in section 64.2001 *et seq.* of the Commission's rules, see Attachment A.

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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

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).

Signed



## **ATTACHMENT A**

### **ALLO Communications Certification of CPNI Compliance For Calendar Year: 2017**

#### **OPERATING PROCEDURES STATEMENT**

ALLO's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. §64.2001 through §64.2011.

The company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as permitted by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action. Additionally, ALLO has established a password protected authentication system for use with all customer accounts. Further, ALLO has processes in place to conduct an annual internal CPNI compliance review.

Although the company has not undertaken any outbound marketing efforts to date, it does have a supervisory review process in place for such efforts in the event that the company does so in the future.

ALLO does not disclose any CPNI to third parties for the purposes of marketing.