

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

Received & Inspected  
MAR 1 - 2019  
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Annual 64.2009(e) CPNI Certification for **2018**

Date filed: **02/19/2019**

Name of company covered by this certification: **E-Polk, Inc. d/b/a PANGAEA**

Form 499 Filer ID: **826464**

Name of Signatory: **Ron Walters**

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Title of Signatory: **Executive Director**

I, Ron Walters, certify that I am an officer of E-Polk, Inc. d/b/a PANGAEA ("PANGAEA"), and, acting as an agent of PANGAEA, that I have personal knowledge that the company has operating procedures and policies in place that are designed to ensure compliance with the Federal Communication Commission's ("Commission") CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

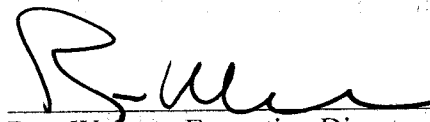
Attached to this certification is an accompanying statement explaining how the company's procedures are designed to maintain compliance with the Commission's CPNI rules.

PANGAEA 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 in the past year. PANGAEA did not receive any complaints in the past year concerning the unauthorized release of CPNI.

PANGAEA has not discovered any information about the processes that pretexters are using to attempt to gain access to CPNI other than the publicly disclosed information in this docket. PANGAEA has taken several measures to safeguard CPNI, including, without limitation, limiting access to customer information to four employees, not capturing any customer call or usage records, and developing and complying with a written CPNI and Internet Privacy Policy and Acceptable Use Policy.

PANGAEA does not provide interstate services, nevertheless is filing this certificate out of an abundance of caution.

Signed

  
Ron Walters, Executive Director

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## **E-Polk, Inc. d/b/a PANGAEA**

### **STATEMENT OF CPNI OPERATING PROCEDURES**

E-Polk, Inc. d/b/a PANGAEA ("PANGAEA") provides this statement pursuant to Section 64.2009(e) of the Federal Communication Commission's ("Commission") rules, 47 C.F.R. § 64.2009(e), to summarize the operational procedures and policies in place that are designed to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules.

#### **About PANGAEA:**

PANGAEA is a non-profit 501(c)(3) company and provides a fiber optic network in two counties within North Carolina for the purposes of providing high speed Internet transport and bandwidth predominantly to schools and libraries, rural healthcare, government agencies, and other non-profit entities.

#### **Use of CPNI:**

PANGAEA does not use, disclose, or permit access to the limited CPNI that it has about its small number of customers except as is permitted by law. PANGAEA may use CPNI to render, provide, bill and collect for the services from which the CPNI is derived. PANGAEA also will use CPNI to protect its property rights, or to protect its customers and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services. PANGAEA also may use CPNI to provide administrative service to the customer for the duration of the call, if the customer initiated the call and the customer approves of the use of such information to provide those services.

#### **Employee Training:**

PANGAEA only has four employees and each has been made aware of the confidentiality of customer information, including what information is classified as CPNI and when its employees are authorized and not authorized to use this information.

#### **Use of CPNI for Marketing Purposes:**

PANGAEA only offers Internet transport and bandwidth. PANGAEA does not use CPNI to market this or any other service. Nor does PANGAEA share CPNI with any person or entity except as is necessary for the reasons discussed above.

#### **Safeguards to Protect CPNI:**

PANGAEA does not permit online account access nor does it have retail locations. Since PANGAEA does not permit online access, the notification requirements regarding online account access are not applicable.

PANGAEA tracks complaints regarding the unauthorized use, disclosure of, or access to CPNI. PANGAEA will report all customer complaints to the Commission, breaking them down by category, and providing a summary of the complaints in its annual certification to the FCC. For the time period covered by the certification, PANGAEA did not receive any complaints regarding CPNI.

PANGAEA's business practices do not include capturing any customer call records or usage data. PANGAEA has a written acceptable use policy and a CPNI and Internet privacy policy which address the confidentiality of customer information.