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

**EB Docket 06-36**

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

1. Date filed: **February 22, 2018**

2. Name of company(s) covered by this certification: **ITS – Integrated Telemanagement Services, Inc**.

3. Form 499 Filer ID: **820318**

4. Name of signatory: **Sharon L. Woods**

5. Title of signatory: **President & CEO**

6. Certification:

I, **Sharon Woods**, 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 *t*aken 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 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Sharon L. Woods, President & CEO

ITS – Integrated Telemanagement Services, Inc.

**Attachment:** Accompanying Statement explaining CPNI procedures

Explanation of actions taken against data brokers (if applicable)

Summary of customer complaints (if applicable)

**Statement of CPNI Compliance**

ITS procedures regarding CPNI ensure compliance with the requirements set forth in section 64.2009 et seq. of the Commission rules Subpart a and b, by requiring that prior to the release of any CPNI, the ITS representative verifies that the person requesting the data is authorized to receive the information through either an account representative verification or signed and executed Letter of Agency. Compliance with 64.2009 subpart c and d are not part of our core business model and therefore not applicable at this time. This document along with the CPNI Certification for 2018 is our compliance for subpart e.

**Explanation of Actions Taken Against Data Brokers**

Because we have not had any data brokers attempt to access our CPNI or customer records in 2015 no action was taken and therefore, an explanation of actions taken is not applicable.

**Summary of Customer Complaints**

For calendar year 2017, ITS did not received any customer complaints regarding CPNI compliance.