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February 5, 2015

(Filed via ECFS)
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Customer Proprietary Network Information Certificate for Hawaiian Telcom, Inc., Hawaiian Telcom Services Company, Inc., SystemMetrics Corporation, and Wavecom Solutions Corporation; EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed is the annual CPNI Certificate of Hawaiian Telcom, Inc., FCC 499 Filer ID No. 803865, Hawaiian Telcom Services Company, Inc., FCC 499 Filer ID No. 825399, SystemMetrics Corporation, FCC 499 Filer ID No. 829287, and Wavecom Solutions Corporation, FCC 499 Filer ID No. 821558.

In accordance with a telephone conversation I had with Tanishia Proctor, Enforcement Bureau, in February 2011, I am filing this Certificate four times via ECFS, once for each of the four companies.

Please let me know if you have any questions.

Sincerely,

Susan J Bahr

Susan J. Bahr, Esq.
Counsel for Hawaiian Telcom, Inc.,
Hawaiian Telcom Services Company, Inc.,
SystemMetrics Corporation, and Wavecom
Solutions Corporation

Enclosure

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

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014

Date filed: February 5, 2015

Name of company(s) covered by this certification/ Form 499 Filer ID:
Hawaiian Telcom, Inc. (803865)
Hawaiian Telcom Services Company, Inc. (825399)
SystemMetrics Corporation (829287)
Wavecom Solutions Corporation (821558)

Name of signatory: John T. Komeiji

Title of signatory: Senior Vice President – General Counsel

I, John T. Komeiji, certify that I am an officer of the Companies named above, and acting as an agent of the Companies, that I have personal knowledge that the Companies have 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 Companies' procedures ensure that the Companies are in compliance with the requirements set forth in Sections 64.2001 *et seq.* of the Commission's rules.

The Companies have not taken any actions against data brokers in the past year. The Companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI. The Companies have no information about the processes pretexters may be using to access CPNI.

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The Companies represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Companies also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject them to enforcement action.

Name (signature): _____

Date: February 2, 2015

Attachment A
Summary of Procedures Related to the Protection of CPNI

Hawaiian Telcom, Inc., Hawaiian Telcom Services Company, Inc., SystemMetrics Corporation and Wavecom Solutions Corporation (collectively "HT") have instituted numerous procedures to ensure their compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.* For example:

Customer Control of HT's use of CPNI. HT does not use CPNI for any purpose other than those specified in Section 64.2005 of the Commission's rules without customer consent. HT's systems clearly identify whether and to what extent a customer has consented to the use or disclosure of CPNI, consistent with Section 64.2005(a) of the Commission's rules. Any HT customer may change his or her CPNI preferences at any time by contacting HT customer service.

Customer Notice. HT obtains a customer's "opt out" consent only after providing the notice required by Section 64.2008 of the Commission's rules. HT waits at least 33 days after such notice is provided before deeming a customer's consent to be effective. HT renews the required notice at least once every two years. HT's legal team reviews all such notices, and all requests for customer consent to the use or disclosure of CPNI, to ensure compliance with Section 64.2008. HT also reviews all proposed uses of CPNI to determine whether additional customer notice and consent is required.

CPNI Access by HT Personnel. HT ensures that customers that have indicated a preference to "opt out" are not included in any list to be used in outbound sales and marketing campaigns (except as permitted by Section 64.2005 of the Commission's rules). HT conducts a supervisory review of all internal requests to use CPNI in such campaigns, pursuant to Section 64.2009(d) of the Commission's rules. HT also conducts a legal review of all contracts and other arrangements involving the potential disclosure of CPNI to third parties. HT maintains records of all sales and marketing campaigns making use of CPNI, and instances (if any) when CPNI is disclosed or provided to third parties, consistent with Section 64.2009(c) of the Commission's rules.

CPNI Access by "Customers." Consistent with Section 64.2010 of the Commission's rules, HT authenticates a customer's identity before

providing access to that customer's call detail records. HT will disclose call detail records in response to a customer-initiated telephone contact only: (i) if the customer first provides a password that is not prompted by HT's request for readily available biographical information or account information; (ii) by sending the records to the customer's address of record; or (iii) by placing a separate call to the customer's telephone number of record. HT will provide a customer with online access to CPNI only after the customer provides a password that is not prompted by HT's request for readily available biographical information or account information. HT will disclose CPNI in response to a customer's e-mail request only by sending the requested information to the customer's address of record or directing the customer to call a customer service representative. HT will disclose CPNI in response to a customer's in-person request only after the customer first presents a valid photo ID matching the customer's account information. HT conducts a supervisory review of requests from "customers" who cannot be immediately authenticated.

CPNI Access by Third Parties. HT conducts a legal or regulatory review of all requests for access to CPNI from non-HT personnel (other than "customers") before granting such requests. In general, HT does not share CPNI with third parties for marketing or any other purpose that would require affirmative customer "opt in" consent. HT conducts a security/legal review of all warrants, court orders, subpoenas, and surveillance requests from law enforcement personnel.

Notification of Improper Access to CPNI. HT has not experienced any CPNI-related security breaches in the past year. If such breaches were to occur, HT would notify law enforcement, as well as customers where appropriate, pursuant to Section 64.2011 of the Commission's rules. Consistent with Section 64.2009(f) of the Commission's rules, HT would also notify customers of any instances in which "opt out" mechanisms did not work properly to such a degree that customers' inability to "opt out" was more than an anomaly.

Self-Assessment and Training. Consistent with Section 64.2009(b) of the Commission's rules, HT reviews on an annual basis the effectiveness of its internal procedures with respect to CPNI, and updates its training materials periodically to reflect changes in the Commission's rules and industry best practices. HT includes CPNI training as part of its initial training for all employees of the company. This training must be refreshed at least annually for all employees. Additional in-depth CPNI training is provided for employees in positions likely to be dealing with CPNI on a regular

basis. All employees are required to certify that they understand this training, and they are instructed to report any concerns about violations of the company's CPNI policy to their supervisor. All employees are further instructed that violations of the CPNI policy, and failure to report suspected CPNI violations, can result in disciplinary action up to and including termination.