

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

EB Docket 06-36

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

Name of company covered by this certification: Halverson Communications, Inc. d/b/a Page1
(successor-in-interest to Christine E. Lawrence d/b/a Page1)

Form 499 Filer ID: 827032

Name of signatory: Christine E. Lawrence

Title of signatory: President

I, Christine E. Lawrence, certify that I am an officer of the company named above (the "Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that, to the best of my knowledge, information and belief, are adequate to ensure compliance with the Commission's CPNI rules as I understand them. *See* 47 C.F.R. § 64.2001 *et seq.* The basis for my certification is summarized below:

The paging and critical messaging services provided by the Company are billed to the customer monthly on a flat-rate basis. As a result, the Company collects at most only minimal information that could be considered CPNI under the FCC's rules. Any use or disclosure of or provision of access to customer-specific information by the Company, whether CPNI or not, requires my approval.

The Company uses, discloses or provides access to CPNI only for the purpose of initiating, rendering, billing or collecting for the paging and critical messaging services provided by the Company. The Company does not disclose or provide access to CPNI to any third parties for any purpose, except to law enforcement personnel in compliance with a subpoena.

The Company does not employ any third parties to market paging or critical messaging services on its behalf. To the extent any marketing of the Company's paging and critical messaging services is done, it is done solely by one or more employees of the Company, and such employees are not provided access to any CPNI for this purpose unless the customer involved specifically initiates a request that requires employee access to CPNI in order to respond.

The Company has reviewed its CPNI policies and practices so as to be in compliance with the CPNI rule changes adopted by the FCC in 2007.

The Company did not take any actions against data brokers (*i.e.*, institute proceedings or file petitions at either state commissions, the court system, or at the FCC) during 2014.

The Company did not experience any incidents of "pretexting" during 2014.

The Company did not receive any customer complaints during 2014 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 FCC. The Company also acknowledges that false statements and misrepresentations to the FCC are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Christine E. Lawrence

Date: 2/20/15