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FCC Mail Room

STATE: FCC

AGENCY: FCC Enforcement Advisory

REPORT: Annual CPNI Certification

ATTENTION: Marlene H. Dortch, Secretary, Federal
Communications Commission
9300 East Hampton Drive, Capital Heights, MD
20743

EB Docket No. 06-36

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Great America Networks, INC.

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

Annual 64.2009(e) CPNI Certification for 2013 covering the prior calendar year 2012

1. Date filed: 2/2015
2. Name of company covered by this certification: Great America Networks, Inc.
3. Form 499 Filer ID: 822738
4. Name of Signatory: Eric W. Brackett
5. Title of signatory: President
6. Certification:

I, Eric W. Brackett, 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 taken 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 

//Attachments: Accompanying Statement explaining CPNI procedures



February 13, 2015

Annual CPNI Compliance Certification for Great America Networks, Inc.

I, Eric Brackett, being of lawful age and duly sworn, on my oath state that I am President of Great America Networks, Inc. I attest that, as an officer of Great America Networks, Inc., I am authorized to execute this CPNI Compliance Certification on the company's behalf.

I do, therefore, state the following:

I, Eric Brackett, have personal knowledge that Great America Networks business methods, and the procedures adopted and employed by the company are adequate to ensure compliance with section 222 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("the Act"), and the Federal Communications Commission's regulations implementing Section 222 of Act, 47 C.F.R § 64.2005, 64.2007 and 64.2009

Furthermore, I certify that, based upon my personal knowledge of these procedures, my company's personnel are trained on these procedures and that these procedures ensure that the company compliance with the rule in Title 47 – Telecommunications, Sections 64.2001 through 64.2009



Signature

Eric Brackett/President
Officer of: Great America Networks

Executed on: February 13, 2015



Accompanying Statement to Annual CPNI Compliance Certification for Great America Networks, Inc.

In Compliance with 47 C.F.R § 64.2009(e), I, Eric Brackett, acting on behalf of Great America Networks, Inc., Certify the company has taken the following actions:

Employee Training and Discipline

- Trained all employees and personnel as to when they are and are not authorized to use CPNI
- Instituted an express disciplinary process unauthorized use of CPNI

Sales and Marketing Campaign Approval

- Guaranteed that all sales and marketing campaigns are approved by management

Record-Keeping Requirements

- Established a system to maintain a record of all sales and marketing campaigns that use their customers' CPNI, including marketing campaigns of affiliates and independent contractors.
- Design its customer service records in such a manner that the status of a customer's CPNI approval can be clearly established.
- Ensured that these records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.
- Made certain that these records are maintained for a minimum of (1) year.

Establishment of a Supervisory Review Process

- Established a supervisory review process for all outbound marketing situations
- Certified that under this review process, all sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval.
- Guaranteed that the Company only discloses CPNI to agents, affiliates, joint venture partners, independent contractors or to any other third parties only after receiving "opt-in" approval from a customer.
- Verified that the Company enter into confidential agreements with joint venture partners, independent contractors' or any third party when releasing CPNI.



Opt-Out Mechanism Failure

- Established a protocol through which the company will provide the FCC with written notice within (5) days of any instance where opt-out mechanisms do not work properly, to such degree that consumers' inability to opt-out is more than an anomaly.

Compliance Certificates

- Executed a statement, signed by an officer, certifying that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the FCC's CPNI regulations.
- Executed a statement detailing how operating procedures ensure compliance within CPNI regulations.
- Executed a summary of all customers complaints received in the past year concerning unauthorized release of CPNI.

Customer Authentication Methods

- Instituted customer authentication methods to ensure adequate protection of customers' CPNI. These protections only allow CPNI disclosure in accordance with the following methods:
 - Disclosure of CPNI information in response to a customer providing a pre-established password;
 - Disclosure of requested CPNI to the customers' address or phone number of record; and
 - Access to CPNI if a customer presents a valid photo ID at the carrier's retail circumstances.

Customer Notification of CPNI Changes

- Established a system under which a customer is notified of any changes to CPNI. This system, at minimum, notifies a customer of CPNI access in the following circumstances:
 - Password Notification
 - A response to a carrier-designed back-up means authentication
 - Online account changes, or
 - Address of record change or creation

Notification to Law Enforcement and Customers of Unauthorized Access

- Established a protocol under which the appropriate Law Enforcement Agency ("LEA") is notified of any unauthorized access to customer's CPNI.
- Ensured that all records of any discovered CPNI breaches are kept for a minimum of two (2) years.



Summary of Actions Taken Against Data Brokers by Great America Networks, Inc.

In compliance with 47 C.F.R § 64.2009(e), I, Eric Brackett, acting on behalf of Great America Networks, Inc., summarize the actions that the Company has taken against data brokers with in the last year:

Detailed list of "any actions" taken against data brokers.

The term "any actions," means: proceeding instituted or petitions filed by carrier at either state commissions, the court system, or at the Federal Communications Commission against data brokers.

For Example:

- 1.) On December 6, 2011, "XYZ Company" filed a complaint in the Federal District Court of Illinois against "Jane Doe" for attempting to obtain customers' CPNI information through "fraud, trickery and deceit." This case is entitled XYZ Company v. Jane Doe, Case No. 01-23456-78.*

No such actions taken against data brokers with in the last year



Summary of Customer Complaints Received by Great America Networks, Inc.

In compliance with 47 C.F.R. § 64.2009 (e), I Eric Brackett, acting on behalf of Great America Networks, provide a summary of customer complaints received within the last year:

- 1) The Company has received no complaints as a result of improper access by employees.
- 2) The Company has received no complaints as a result of improper disclosure to individuals not authorized to receive the information.
- 3) The Company has received no complaints in a result of instances of improper access to online information by individuals not authorized to view the information.
- 4) In addition, the Company is aware of the following processes pretexters are using to attempt to access CPNI, and what steps carriers are taken to protect CPNI:

None

(Provide information concerning processes pretexters are using to attempt to access CPNI and what step carriers are taken to protect CPNI.)