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;

1. Date filed: February 26, 2015

2. Name of company(s) covered by this certification: **Pete's Communications, Inc.**

3. Form 499 Filer ID: 820344

4. Name of signatory: Peter C. Hoagland

5. Title of signatory: President

6. Certification:

I, Peter C. Hoagland, 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 any data brokers in the past year.

The company has not received any 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 _____

Pete's Communications, Inc.
1350 NW 7th Street
Willman, Minnesota 56201
(320) 235-0630

Dated February 26, 2015

STATEMENT EXPLAINING HOW THE COMPANY'S PROCEDURES ENSURE THAT THE COMPANY IS IN COMPLIANCE WITH THE REQUIREMENTS SET FORTH IN SECTION 64.2001 *ET SEQ.* OF THE COMMISSION'S RULES

Pete's Communications, Inc. ("Carrier") has established operating procedures that ensure compliance with the Federal Communications Commission ("Commission") regulations regarding the protection of Consumer Proprietary Network Information ("CPNI").

Carrier does not sell, rent or otherwise disclose customers' CPNI to other entities, unless directed by law enforcement pursuant to a valid subpoena issued by a court of competent jurisdiction.

Carrier does not use any customer CPNI in any marketing activities.

Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to any use of CPNI.

Carrier procedures require affirmative written/electronic customer approval or valid Court Order for the release of CPNI to third parties.

Carrier maintains a record of any and all instances where CPNI was disclosed or provided to third parties, including law enforcement or where third parties were allowed access to CPNI. The record includes a description of each campaign or request, the specific CPNI that was used in the campaign or request, and what products and services were offered as a part of the campaign or request.

Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.

Carrier has established procedures for the training of its personnel with access to CPNI. Employees have been trained as to when they are and are not authorized to use CPNI.

Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.

To the extent that Carrier sells or supplies any customer equipment that permits the collection or storage of CPNI from the end-user device itself, Carrier has taken no steps to collect, access or control that CPNI.