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

EB Docket 06-36

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

1. Date filed: **February 27, 2015**
2. Name of company(s) covered by this certification: **The Micronesian Telecommunications Corporation and PTI Pacifica Inc. d/b/a IT&E**
3. Form 499 Filer ID: **803851, 803890, 827217**
4. Name of Officer signing: **Steven Carrara**
5. Title of Officer signing: **General Counsel**
6. Certification:

I, **Steven Carrara**, 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 as Exhibit 1 is an accompanying statement explaining how the companies' procedures ensure that the companies are 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 companies have not taken any actions (i.e. proceedings instituted or petitions filed by a company at either state commission, the court system, or at the Commission against data brokers) 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.

Signed_____
STEVEN CARRARA

Exhibit 1

IT&E

CPNI Compliance Accompanying Statement

This accompanying statement explains how the operating procedures of The Micronesian Telecommunications Corporation ("MTC") and PTI Pacifica Inc. (formerly known as GTE Pacifica Inc.) (collectively doing business as "IT&E") ensure that the company is in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations. MTC provides local exchange service; PTI Pacifica Inc. provides CMRS and interexchange service.

IT&E adheres to all CPNI rules as stated in section 64.2001- 64.2011 concerning the proper use of our customers' CPNI. IT&E does not presently use, disclose, or permit access to CPNI in a manner that requires opt-in approval. It is IT&E's current policy to not use CPNI for any marketing purposes, either within or outside a customer's total services. To the extent that CPNI is used to market outside a customer's total services, it is IT&E's current intention to limit such use for the purpose of marketing communications-related services. Specifically, our opt-out notice and approval for use of CPNI approval process meets all requirements as listed in Sections 64.2007-64.2008.

To further protect our customers' privacy in accordance with the Commission's rules, we have implemented all safeguards required in Section 64.2009:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of IT&E's policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification to the Commission of any instance where opt-out mechanisms, do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

IT&E has on file with the FCC (as of March 1, 2008) its CPNI Manual, without the sample Forms, as further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64 of Title 47 of the Code of Federal Regulations.

IT&E has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including network security measures consistent with industry best practices. IT&E also protects certain customer information, including information which

constitutes CPNI, in accordance with a Network Security Agreement entered into with U.S. executive branch agencies. See 18 FCC Rcd. 23140 (IB 2003). With respect to the FCC's rules, IT&E requires proper authentication prior to disclosing CPNI based on customer initiated telephone contact, online account access or in-store visits.

- With respect to customer-initiated telephone calls, IT&E will only provide call detail information when a password is provided, or by sending it to the customer's address of record or by calling the telephone number of record.
- All online access requires a password.
- In-store access to CPNI requires either a password or valid photo ID.
- Notification of account changes, including password, backup authentication method, online account or address of record, is provided to customers in accordance with FCC rules.

IT&E has implemented processes to notify law enforcement and affected customers of a breach of customers' CPNI consistent with the FCC's rules. Records of breaches (if any) are maintained for at least two years.