



January 8, 2016

Federal Communications Commission  
Telecommunications Consumer Division  
Enforcement Bureau  
445 12<sup>th</sup> Street, SW, Room 4-A234  
Washington, DC 20554

Re: EB Docket No. 06-36

Dear Sir or Madam;

Please find the enclosed CPNI certification and feel free to call if you have any questions.

The undersigned, as an officer of 1stel, Inc., certifies that 1stel, Inc. is in compliance with Section 64.2009 of the Commission's rules.

Respectfully submitted,

Douglas Bowyer  
President  
1stel, Inc.



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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015

Date filed: January 8, 2016

Name of company covered by this certification: 1stel, Inc

Form 499 Filer ID: 826419

Name of signatory: Douglas Bowyer

Title of signatory: President / CEO

I, Douglas Bowyer, certify that I am an officer of 1stel, Inc (1stel), 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. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the 1stel'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.

1stel has not taken any actions (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.

1stel has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Douglas Boywer  
President  
1stel, Inc



## **Accompanying Statement to Annual CPNI Compliance Certification for 1stel, Inc.**

In compliance with 47 C.F.R. § 64.2009(e), I, Douglas Bowyer, acting on behalf of 1stel, 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 for unauthorized use of CPNI.
- Developed electronic safeguards to prohibit access to CPNI by employees unless;
  - permitted by law for approved purposes
  - permitted access by the registered agent of customer

### **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.
- 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 a part of the campaign.
- Made certain that these records are maintained for a minimum of one (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.

### **Opt-In**

- 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 enters into confidential agreements with joint venture partners, independent contractors or any other third party when releasing CPNI.

### **Opt-Out Mechanism Failure**

- Established a protocol through which the Company will provide the FCC with written notice within five (5) business days 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.