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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015

Date filed: 1/19/16

Name of company covered by this certification: Jeffrey Frank

Form 499 Filer ID: Not Applicable

FRN: 0003757200

Name of signatory: Jeffrey Frank

Title of signatory: Owner

I, Jeffrey Frank, 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The company 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.

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

Attachments: Accompanying Statement explaining CPNI procedures.

Name of Company covered by this filling ("Carrier"): Jeffrey W Frank
FCC Registration Number ("FRN"): 0003757200
Form 499 Filer ID: Not Applicable
Address:
Jeffrey W Frank
5031 Wagon Wheel Road
Manitowoc, WI 54220

Accompanying CPNI Statement

This statement serves to explain how Jeffrey W Frank, (the "Company") has established operation procedures that ensure compliance with the Federal Communications Commission regulations regarding the protection of Consumer Proprietary Network Information ("CPNI").

The Company does not engage in sales and marketing campaigns and therefore, there is no risk of customers' CPNI being disclosed or provided to third parties. The company does not engage in outbound marketing and therefore, a supervisory review process is unnecessary. If at some point in the future the company decides to engage in sales and marketing campaigns, the company will implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

The Company requires authentification before the release of CPNI information is given to the requestor. This is established by calling the customer back at the telephone number associated with the communication service, by mailing the information to the address of record, or by releasing it in person following authentication via valid government-issued photo identification at our office. We may disclose CPNI if we are required to by the law, such as Court Order or subpoena.

The Company does not collect and thus does not possess any information concerning the usage of its service by it subscribers. Specifically, the Company does not possess any information concerning the existence, source, or destination of any communication to or from its subscribers.

The Company does maintain contact information necessary to contact and bill its subscribers. This information is kept in locked cabinets and password protected computer files.

The Company continually educates and trains its employees regarding the appropriate use of CPNI. The detail of the training can differ based on the employee's specific job within the Company and whether or not the employee has access to CPNI. The Company has an express disciplinary process in place whereby personnel will be verbally reprimanded with notation in personnel file upon the first occurrence of unauthorized use of CPNI. Upon further occurrence, personnel will face suspension or termination.