Redi-Call
COMMUNICATIONS

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Via Electronic Filing

February 16, 2016

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: EB Docket No. 06-36
CPNI Certification

Dear Ms. Dortch:

Transmitted herewith is Redi-Call Communications Co.'s annual filing pursuant to 47 C.F.R. 64.2009(e) for Customer Proprietary Network Information (CPNI) Certification for year 2015.

Please address any questions in this regard to the undersigned at 302-856-9000 or by email to randym@redicall.com.

Sincerely,
Redi-Call Communications Co.

Randy K. Murray
President

Enclosure

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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 2015.

Date Filed: February 16, 2016

Name of company covered by this certification: Redi-Call Communications Co.

Form 499 Filer ID: 809172

Name of signatory: Randy K. Murray

Title of signatory: President

I, Randy K. Murray, certify that I am an officer of the company named above, and acting as an agent for 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 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 any actions (i.e., proceedings instituted or petitions filed by the 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 actions.

Signed _____
Randy K. Murray, President

Attachment: Accompanying Statement explaining company CPNI procedures

REDI-CALL COMMUNICATIONS CO.

STATEMENT EXPLAINING HOW THE COMPANY'S OPERATING PROCEDURES ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES

I. Customer Proprietary Network Information ("CPNI")

CPNI is defined in Section 222(f) of the Communications Act as: (A) information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier (except that CPNI does not include subscriber list information).

Generally, CPNI includes personal information regarding a customer's use of his or her telecommunications services. CPNI encompasses information such as: (a) the telephone numbers called by a customer; (b) the length of a customer's phone calls, and (c) the telecommunications and information services purchased by a customer.

II. Use of CPNI Is Restricted

The Company recognizes that CPNI includes information that is personal and individually identifiable, and that privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside the Company.

The Company has designated a CPNI Compliance Officer who is responsible for: (1) communicating with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of Company employees and agents who use or have access to CPNI; and (3) receiving, reviewing and resolving any questions or issues arising within the Company regarding use, disclosure, or provision of access to CPNI.

Company employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the Company's CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

III. Permissible Uses of CPNI

Company employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside the Company, except as follows:

1. The Company may, after receiving an appropriate request from a customer, disclose or provide the customer's CPNI to any person or entity designated by the customer. All such customer requests: (1) must be made in writing; (2) must include the customer's correct billing name and address and telephone number; (3) must specify exactly what type or types of CPNI must be disclosed or provided; (4) must specify the time period for which the CPNI must be disclosed or provided; and (5) must be signed by the customer.

2. In the absence of an appropriate written request from the customer, the Company may provide the customer's calling records or other CPNI to a law enforcement agency only in response to a lawful warrant or subpoena that specifies the particular CPNI to be furnished.

3. The Company may use, disclose or permit access to CPNI to provide the same category of telecommunications service to a customer from which the CPNI is derived.

4. The Company and its authorized employees may use, disclose or permit access to CPNI to provide services necessary to, or used in, the provision of the telecommunications service from which the CPNI is derived.

   a. The FCC has noted the publishing of directories as an example of this permitted use.

   b. The FCC has indicated that telecommunications carriers may use, disclose or permit access to CPNI, without customer approval, to provide maintenance and repair services.

   c. The FCC has stated that commercial mobile radio service providers may use CPNI, without customer approval, to market "adjunct-to-basic" services.

   d. Any other use, disclosure or provision of CPNI under this "necessary to or used in the provision of" category must be expressly approved in writing by the Company's CPNI Compliance Officer.

5. The Company, its authorized employees and its billing agent may use CPNI to initiate, render, bill and collect for telecommunications services.

6. The Company may use CPNI to protect the Company's rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived.

7. The Company may use, disclose, or permit access to CPNI derived from its provision of Commercial Mobile Radio Services, without the customer's approval, to provide customer premises equipment ("CPE") and information services.

8. If a customer subscribes to more than one category of service offered by the Company, the Company is permitted to share CPNI among its affiliated entities that provide a service offering to the customer. If a customer does not subscribe to more than one offering by the Company, the Company is not permitted to share CPNI with its affiliates without the customer's consent pursuant to the notice and approval procedures set forth in Sections 64.2007, 64.2008 and 64.2009 of the FCC's Rules.

9. When an existing customer calls the Company to inquire about or order new, additional or modified services (in-bound marketing), the Company may use the customer's CPNI to assist the customer for the duration of the customer's call if the Company provides the customer with the oral notice required by Sections 64.2008(c) and 64.2008(f) of the FCC's Rules.

10. The Company uses, discloses, and/or permits access to CPNI in connection with Company-initiated marketing of services to which a customer does not already subscribe from the Company (out-bound marketing) only pursuant to the notice and approval procedures set forth in Sections 64.2007, 64.2008, and 64.2009 of the FCC's Rules. All proposed out-bound marketing activities are reviewed by the Company's CPNI Compliance Officer for compliance with the CPNI restrictions and requirements in the Communications Act and the FCC Rules.

11. The Company maintains a record, electronically or otherwise, of its own and affiliates' sales and marketing campaigns that use its customer CPNI. A record (including 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) is also maintained of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. Records are retained for a period of one year.

IV. CPNI Compliance Officer

In addition to the specific matters required to be reviewed and approved by the Company's CPNI Compliance Officer, employees and agents are strongly encouraged to bring all other questions, issues or uncertainties regarding the use, disclosure, or access to CPNI to the attention of the Company's CPNI Compliance Officer for appropriate investigation, review and guidance. The extent to which a particular employee or agent brought a CPNI matter to the attention of the CPNI Compliance Officer and received appropriate guidance is a material consideration in any disciplinary action brought against the employee or agent for impermissible use, disclosure or access to CPNI.

V. Disciplinary Procedures

The Company has informed its employees and agents that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be of vital importance.

Violation by Company employees or agents of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, probation, and termination), depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from the CPNI Compliance Officer, and the extent to which the violation was or was not deliberate or malicious).