



February 26, 2016

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

RE: CPNI Certification for ACS Wireless, Inc.
EB Docket No. 06-36

Dear Secretary Dortch:

Enclosed please find the ACS Wireless, Inc.'s compliance certificate for the most recent period, along with an accompanying statement explaining how operating procedures ensure compliance with section 64.2009(e) of the Commission's rules.

On February 2, 2015 ACS Wireless, Inc. completed its transaction with General Communication, Inc. ("GCI") transferring all of its customer contracts to GCI. ACS Wireless, Inc. no longer has any wireless customers.

Please call Lisa Phillips, Manager, Regulatory Affairs, at (907) 297-3130 with any comments or concerns.

Sincerely,

ACS WIRELESS, INC.

A handwritten signature in black ink that reads 'Lisa Phillips' in a cursive script.

Lisa Phillips
Manager, Regulatory Affairs

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 26, 2016**

Name of company covered by this certification: **ACS Wireless, Inc.**

Form 499 Filer ID: **0001-5679-40**

Name of signatory: **Laurie Butcher**

Title of signatory: **Senior Vice President - Finance**

I, Laurie Butcher, 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 actions against data brokers in the past year. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI. The company has safeguards in place to protect CPNI from pretexters, which are further described in the accompanying statement.

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

A handwritten signature in cursive script, appearing to read "Laurie Butcher", written over a horizontal line.

ACS Wireless, Inc.

**Statement Explaining Compliance with CPNI Rules
for 2015**

ACS Wireless, Inc. had the following practices and procedures in place to ensure compliance with the customer proprietary network information ("CPNI") rules of the Federal Communications Commission ("FCC"), 47 C.F.R. § 64.2001-2011, and Section 222 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 222.

- We had implemented safeguards to ensure that the status of a customer's CPNI approval (or absence of approval) was confirmed before CPNI was used in any marketing efforts. See 47 C.F.R. § 64.2009(a).
- We regularly trained personnel regarding the permissible and impermissible uses of CPNI, had adopted written CPNI policies which were available to employees, and had supervisory and disciplinary processes in place to address any violations of the CPNI rules. See *id.* § 64.2009(b).
- We maintained records of each marketing campaign that made use of customers' CPNI. Our records are sufficient to describe each campaign, identify the CPNI utilized, and record the instances in which CPNI was disclosed, provided, or made available to third parties for marketing purposes. See *id.* § 64.2009(c).
- We had established a supervisory review process to ensure compliance with CPNI rules in any outbound marketing campaign. Sales personnel obtained supervisory approval for any proposed new outbound marketing campaign or efforts to obtain customer approval for use of CPNI. See *id.* § 64.2009(d).

- We had implemented systems and processes to establish customer passwords and properly authenticate customers who initiate telephone, online or in-store requests for CPNI prior to the release of any such data. See 47 C.F.R. § 64.2010(a)-(e).
- We had established systems and processes to immediately notify customers whenever a password, customer response to a back-up means of authentication, online account, or address of record is created or changed, in accordance with the FCC's rules. See 47 C.F.R. § 64.2010(f).
- We retain records of compliance for at least the minimum time periods specified in Part 64 of the FCC's rules.