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

Annual 64.2009(e) CPNI Certification for 2016 covering the prior calendar year 2015

1. Date filed: February 29, 2016
2. Name of company covered by this certification: Contigo Wireless LLC
3. Form 499 Filer ID: 829353
4. Name of signatory: Brian Cox
5. Title of signatory: CEO
6. Certification:

I, Brian Cox, certify that I am an officer of Contigo Wireless, LLC ("Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures, summarized in the attached statement, that are adequate to ensure compliance with the customer proprietary network information ("CPNI") rules as set forth in Part 64, Subpart U of the Commission's 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 set forth in Section 64.2001 *et seq*. of the Commission's rules (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review).

The Company has not received any customer complaints in the past calendar year concerning the unauthorized release of CPNI, and is not aware of any unauthorized disclosures of CPNI. Company does not have any material information with respect to the processes pretexters are using to attempt to access CPNI that is not already a part of the record in the Commission's CC Docket No. 96-115. Company has therefore not taken any actions against data brokers, including proceedings instituted or petitions filed by the company at either state commissions, the court system or at the Commission.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject the Company to enforcement actions.

Brian Cox
CEO
Contigo Wireless LLC
Executed February 29, 2016

Contigo Wireless

Procedures for Compliance with CPNI Rules

Contigo Wireless has instituted the following procedures to assure compliance with the requirements set forth in the Federal Communications Commission's rules, 47 C.F.R. Part 64, Subpart U, Section 2001 *et seq.*, governing Customary Proprietary Network Information ("CPNI").

CPNI is "(A) information that relates to the quantity, technical configuration, type, destination, location, 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."

I. USE, DISCLOSURE OF, AND ACCESS TO CPNI

Contigo provides prepaid calling card services. It does not know the identity of its customer. It therefore cannot associate a customer's CPNI with the identity of any person. Contigo may use, disclose or permit access to CPNI without the customer's approval in its provision of the communications service from which such information is derived; for services necessary to, or used in, the provision of such communications service; to initiate, render, bill and collect for communications services; to protect the rights or property of Contigo, or to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services; to market services within the category or categories of services to which the customer already subscribes; or as required by law.

Contigo does not use or disclose CPNI in any manner requiring customer approval, including but not limited to the use of CPNI for the marketing or the provision of CPNI to a third party, except as indicated in the above disclosure. Contigo does not use, disclose or permit access to CPNI to identify or track customers who call competing local service providers. When Contigo receives or obtains proprietary information from another carrier for purposes of providing telecommunications service, it shall use such information only for such purpose and shall not use such information for its own marketing efforts.

II. SAFEGUARDS AGAINST DISCLOSURE OF CPNI TO UNAUTHORIZED PARTIES

After purchasing a calling card, the customer is able to view the PIN number associated with the card. This PIN is a randomly generated number and cannot be changed. The customer must provide the PIN to obtain any account information from Contigo customer service. Contigo does not provide access to account information online or in person at retail locations.

III. REPORTING CPNI BREACHES TO LAW ENFORCEMENT

Contigo will notify the appropriate government entities of any breach of CPNI. A "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI.

IV. RECORD RETENTION

Contigo maintains records of any breaches and the resulting notifications to government entities and customers for a minimum of 2 years. Records include, if applicable, date of discovery and notification, detailed description of the CPNI that was the subject of the breach, and the circumstance of the breach.

Contigo maintains records of all customer complaints related to its handling of CPNI, and to Contigo's handling of the complaint, for a minimum of 2 years.

Contigo does not utilize CPNI for marketing purposes; however, to assure compliance, sales personnel must get supervisory approval for outbound marketing promotions. Contigo maintains records of such promotions for a minimum of one year. Records include a description of each promotion and what products or services are offered as a part of the promotion.

Contigo will have an authorized corporate officer of the company sign a compliance certificate on an annual basis stating that the officer has personal knowledge that Contigo has established operating procedures that are adequate to ensure its compliance with FCC's CPNI rules. The certificate will be filed with the FCC by March 1 of the subsequent year, and will be accompanied by a summary or copy of this policy that explains how operating procedures ensure that Contigo is in compliance with the FCC's CPNI rules. In addition, the filing must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. Confidential portions of these submissions shall be redacted from the public version of the filing and provided only to the FCC.

V. TRAINING

Contigo employees have sufficient training as to when they are authorized to release or use CPNI, and understand that any violation of these rules will result in disciplinary action which could include dismissal and possible criminal prosecution.