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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013

1. Date filed: February 20, 2014

2. Name of company(s) covered by this certification: Maximum Communications Cellular, LLC

3. Form 499 Filer ID: 827995

4. Name of signatory: Carl Koehn, Jr.

5. Title of signatory: General Manager

6. Certification:

I, Carl Koehn, Jr, 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 (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 actions (*i.e.,* 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 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 _____
Carl Koehn, General Manager

Attachments: Accompanying Statement explaining CPNI procedures

Duet www.DuetIP.com

Customer Proprietary Network Information (CPNI) Compliance Procedures

Maximum Communications Cellular, LLC (DBA Duet IP) ("MCC") has established and implemented the following internal policies and procedures that ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended, and with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), codified at 47 C.F.R. § 64.2001 et seq. The following operating procedures ensure that MCC is in compliance with the FCC's CPNI Rules:

1. CPNI Compliance officer has been designated to oversee all CPNI duties, training, and activity
2. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI
    - Disciplinary process has been defined and is in place for violations and/or breaches of CPNI
3. Carrier authentication requirements have been met
    - All customer during a customer-initiated telephone call are authenticated as being an authorized account contact before discussing CPNI (non-call detail or call detail) without utilizing readily available biographical or account information as defined by the FCC
    - Call detail is only released to customers during customer-initiated telephone contact if a password is provided. If the requesting customer does not provide a password, only the following FCC approved methods are permitted for the release of the requested call detail:
        - Sending the requested detail to the address of record (only a physical or email address associated with that particular account that has been in our company files for at least 30 days)
        - Calling the customer back at the telephone of record (only disclosing if the customer was authenticated as being an authorized account contact)
        - Having customer come in to Company's office and provide a valid government issued photo ID
4. Notice to customer of account change as customers are notified immediately when a customer creates or changes one of the following:
    - password
    - customer response to a back-up means of authentication for lost or forgotten passwords
    - online account
    - address of record
5. Notice of unauthorized disclosure of CPNI, a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC
6. CPNI is not utilized for marketing purposes
7. Additional protection measures are taken above and beyond the current FCC CPNI rules
    - MCC takes reasonable measures to discover and protect against activity that is indicative of pretexting
    - MCC maintains security of all CPNI, including but not limited to:
        - Documents containing CPNI are shredded
        - Computer terminals are locked when employee is not at the station
8. Strict controls are in place involving responses to law enforcement agencies that serve MCC with valid legal demands, such as a court ordered subpoena, for CPNI. MCC will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.

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