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.

Date filed: January 23, 2014

Name of company covered by this certification: Michael C Ellis, d/b/a Quickrelay Networks Inc.

Form 499 Filer ID: N/A

Name of signatory: Michael C. Ellis

Title of signatory : CEO

I, Michael C. Ellis, 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 is 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: Michael C Ellis, CEO, Quickrelay Networks Inc.

Attachments: Accompanying Statement explaining CPNI procedures (2 pages)

Name of Company: Michael C. Ellis d/b/a Quickrelay Networks Inc. ("Carrier")
FCC Registration Number : 0016006314 Form 499 Filer ID: N/A
Address: PO Box 5969, Sevierville TN 37864

2013 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE

February 23, 2014

This statement serves to explain how Michael C Ellis, d/b/a Quickrelay Networks Inc. is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information ("CPNI"). The FCC's Rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2011).

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

As of this date, the Company has not used nor plans to use CPNI for marketing nor does the Company share CPNI with any outside individual, company, or any other entity.

1. Identification of CPNI.
The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section of 64.2003(g) and Section 222(f)(1) for the Communications Act of 1934 as amended (47 U.S.C § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules.
The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization.
The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI <u>not</u> requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization.
The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process.
The Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out process. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process. The Company has trained employees regarding the prohibitions on the use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

6. Record of Customer CPNI Approval/Non-Approval.
At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI.
The Company has established procedures appropriate for compliance with Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

Procedures and process to control customer access to on-line account information in compliance with Section 64.2010(c) does not apply as there is no path or remote capability to access CPNI via on-line.

Implementation of procedures to notify customers of account changes.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints.
Pursuant to Section 64.2009, the Company makes the following 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:

Not applicable: No actions taken against data brokers during the year.
No customer complaints received during the year.

9. Disciplinary Process.
The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing.
Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI Rules.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches.
The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.