



Interstate Telecom Consulting, Inc.

Independent Telecommunications Consultants

Client Advisory

To: ITCI Clients
From: Roxi Hacker
Date: January 16, 2026
Subject: CPNI Annual Certification

Pursuant to 47 C.F.R. 64.2009(e) CPNI Certifications must be filed annually between January 1st and March 1st. Any company failing to be compliant with the CPNI rules and certification may be subject to fines of up to \$251,322 for each violation or for each day of a continuing violation, up to a maximum of \$2.1 million.

If your company has had any instances in which action was taken against a data broker or if you received any customer complaints regarding the release of CPNI, an attachment of the information must accompany the filing. Certifications must also include a statement ensuring your company's compliance with CPNI. ITCI has a copy of this document and will supply it to you for filing if needed.

For the 2026 filing, which covers 2025 calendar year, companies may file via the FCC's Electronic Comment Filing System (ECFS) under Docket # 06-36 to be compliant. (this is the preferred method of filing).

If you would like ITCI to file on your behalf, complete the attached word document, place it on your company letterhead and send it back to me for filing.

Filing can also be made in the FCC's CPNI portal: <https://apps.fcc.gov/eb/CPNI/>. However, we recommend filing via ECFS.

If you choose to file on your own and need the compliance document, contact me and I will send it via email. Send confirmation when the filing is completed.

****Remember separate certifications must be filed for each subsidiary that is covered under your CPNI manual.**

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