

Sample. Kestrel Voice Networks, LLC is a fictional company; every name, number and answer here is invented to show what a real certificate and filing guide contain.

CPNI Certification Filing Guide

Kestrel Voice Networks, LLC · Annual certification for 2027, covering calendar year 2026 · Due March 1, 2027

READY FOR YOUR REVIEW

Your answers cover each safeguard the rules require. Read the statement closely: every sentence describes something you told us you do. If any sentence isn't true today, tell us before your officer signs.

1 Before your officer signs

RECOMMENDED Put vendor confidentiality terms in writing 47 CFR § 64.2010(a)

Written confidentiality obligations for vendors that handle CPNI make it easier to show your safeguards are adequate.

2 Check your draft before signing

The FCC's Enforcement Bureau lists the deficiencies it most often finds in these filings (FCC Enforcement Advisory DA 26-139 (February 11, 2026)). Your draft is built to avoid each one; confirm them as you read:

- ☐ **The officer states personal knowledge.** The certificate's first paragraph says it; the signer must be an officer who can truthfully make that statement.
- ☐ **The statement explains how, not just that.** The Bureau says that "stating that the company has adopted operating procedures without explaining how compliance is being achieved does not satisfy this requirement." Each section of your statement describes a specific practice.
- ☐ **Data brokers are addressed affirmatively.** Your certificate states whether you took actions against data brokers. The FCC requires a clear statement even when the answer is no.
- ☐ **Complaints are addressed affirmatively.** It also states whether you received complaints about unauthorized release of CPNI, again even when the answer is no.
- ☐ **Every sentence is true today.** If anything in the statement doesn't describe what you actually do, tell us and we'll correct it.

3 Signing

An officer of the company signs the certificate on the signature line, as agent of the company (47 CFR § 64.2009(e)). Fill in the "Date filed" line with the date it will be submitted, then save the signed certificate and statement

together as one PDF.

4 Filing, by March 1, 2027

If you bought the March 1 Bundle, send us the signed PDF and we'll file it and send you the FCC's confirmation. To file it yourself through the FCC's Electronic Comment Filing System (ECFS):

- 1 Go to fcc.gov/ecfs/filings/standard (Submit a Standard Filing).
- 2 In **Proceeding(s)**, enter **06-36** and select EB Docket 06-36, "CPNI Compliance Certification Annual Filing."
- 3 In **Name(s) of Filer(s)**, enter Kestrel Voice Networks, LLC.
- 4 For **Type of Filing**, choose **Compliance Filing**. Most filers in this docket use that type.
- 5 For **Address of**, choose **Filer** and enter the company's address. Upload the signed PDF, choose **Yes** for an email confirmation, and click **Continue to Review Screen**. Check the details, then submit.
- 6 Save the confirmation email or page. Your filing will appear publicly in docket 06-36.

The FCC also offers a dedicated web application for these certifications at apps.fcc.gov/eb/CPNI. Either route satisfies the requirement. File a separate certification for each affiliate that has its own Form 499 Filer ID, and don't send copies to Enforcement Bureau staff (FCC Enforcement Advisory DA 26-139 (February 11, 2026)).

5 Why it matters

The CPNI rules apply to telecommunications carriers and interconnected VoIP providers of every size; there is no small-company exemption. The FCC can impose forfeitures of up to \$251,322 for each violation or each day of a continuing violation, up to \$2,513,215, and false statements to the Commission may be punishable under Title 18 of the U.S. Code (FCC Enforcement Advisory DA 26-139 (February 11, 2026)). Questions about the filing itself can go to the Enforcement Bureau at EB-TCD-Privacy@fcc.gov.

Quiet Deadline is an independent company and is not affiliated with the Federal Communications Commission. This guide and the drafted certificate and statement are preparation based on your answers and the FCC sources cited; they are not legal advice. Your officer is responsible for the truth of everything certified. Questions: tyler@quietdeadline.com.