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February 5, 2019  
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary  
Federal Communications Commission  
9050 Junction Drive  
Annapolis Junction, MD 20701

RE: Worldwide Telecommunications, Inc.  
EB Docket No. 06-36; CY2018

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Worldwide Telecommunications, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to [swarren@inteserra.com](mailto:swarren@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon R. Warren

Sharon R. Warren  
Consultant

cc: Cheryl Lundy - WTI  
tms: FCx1801


Enclosures  
SW/mp

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019:	Covering calendar year 2018
Name of company(s) covered by this certification:	Worldwide Telecommunications Inc.
Form 499 Filer ID:	824436
Name of signatory:	Robert Gilbert Jr.
Title of signatory:	CIO

1. I, Robert Gilbert 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.*
2. 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 §64.2001 *et seq.* of the Commission's rules.
3. 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 in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. 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.

  
\_\_\_\_\_  
Robert Gilbert Jr., CIO  
Worldwide Telecommunications Inc.

2/4/19  
\_\_\_\_\_  
Date

Attachment A  
Statement of CPNI Procedures and Compliance

**Statement of CPNI Procedures and Compliance  
For 2018  
Worldwide Telecommunications, Inc.**

Worldwide Telecommunications Inc. is a long distance reseller providing non-telecommunications services as well as 1+ service for use by payphone providers. We do not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Our marketing efforts do not require the use of any client-specific information. Should we elect to use CPNI in any future marketing efforts, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

We have put into place specific processes to safeguard our customers' CPNI and call detail information from improper use or disclosure by employees. Only three employees have access to this data. At weekly staff meeting, internal policies are addressed, including protection of client data from disclosure and CPNI regulations. In addition, annual staff meetings with the entire company are held where topics include the impact of CPNI rule changes on other departments' responsibilities (e.g. technology upgrades).

We have instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Our authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Only the primary client contact can request data over the phone, and that individual is required to respond correctly to specific "shared secret" questions each and every time prior to disclosure of any information. If the appropriate password is not provided, we require that the request for data must be submitted in writing and signed by a previously approved party. The information is then sent out using previously confirmed contact information (email, fax, mail address).

We have instituted authentication procedures to safeguard the disclosure of CPNI on-line which do not require the use of readily available biographical information or account information as defined by the FCC. We authenticate customers by providing unique access codes and passwords that are required in order for clients to obtain their data from the web. The passwords do not involve readily available biographical information or account information. Unless the appropriate password is provided, we do not allow on-line access to the client's data.

We have procedures in place to notify customers whenever a password, authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information. We do not send the notification to the new account information. We notify clients by phone only, and only to the primary contact on the account.

We do not have any retail locations and therefore do not disclose CPNI in-store.

We have not had any attempts by third parties to gain unauthorized access to client information and therefore have no records to date of such breaches. However, we have procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

We have not taken any actions against data brokers in the last year.

We have not received any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2018.

Due to the nature of our business, the call detail we have is not tied to any presubscribed customers and does not include CPNI. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.