

**Annual 47 C.F.R. § 64.2009(e)  
CPNI Certification Template  
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Name of company(s) covered by this certification: **First Communications, LLC**
2. Form 499 Filer ID: **819644**
3. Name of signatory: **Sandi Murphy**
4. Title of signatory: **General Counsel & Secretary**
5. Certification:

I, **Sandi Murphy**, 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. [NOTE: If you reply in the affirmative, please provide an explanation of any actions taken against data brokers.]

The company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, please provide a summary of such complaints. This summary should include number of complaints, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

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   
Sandi Murphy  
General Counsel & Secretary

**Attachments:** Accompanying Statement explaining CPNI procedures

## **Attachment A**

### **Customer Proprietary Network Information Policy**

First Communications, LLC has established policies and procedures to satisfy compliance with the Federal Communications Commission's ("FCC's") rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in sections 64.2001 et seq. First Communications, LLC takes steps to secure the privacy of all of its customers' information, as evidenced by the Privacy Policy posted on its website and the specific policy regarding the use of CPNI.

This attachment summarizes the steps taken by First Communications, LLC to implement its CPNI policy.

- First Communications, LLC has a company manual that details how employees are expected to treat any confidential information including CPNI.
- All First Communications, LLC and applicable affiliate company employees are required to sign the company manual as a condition of employment.
- All customer information is maintained in a password protected database that can be accessed only by authorized employees and affiliate employees whose job functions cross company boundaries, such as Customer Care.
- Authorized employees may access CPNI to address customer questions only when the person calling provides the correct password or is listed as an "authorized contact" for the business customer.
- First Communications, LLC requires prior written approval from customers for any information disclosed to an unaffiliated third party, except to the extent the disclosure is required for the purpose of the agreement.
- First Communications, LLC's contracts require prior written approval from customers as part of the contract for marketing services by First Communications, LLC unrelated to the services being subscribed for.
- First Communications, LLC established passwords and reminder questions for all new customers and all customers requesting call detail information once positive verification is obtained.
- First Communications, LLC notifies all customers when there is a change of the password, reminder question or answer, the address of record or the on-line access information.
- In accordance with First Communications, LLC's policy, First Communications, LLC does not use CPNI for any marketing purpose other than to market services to customers within the same category of service to which they already subscribe or to enhance, upgrade, supplement or replace existing services. First Communications, LLC also may use CPNI as required to render services and to bill for such services.
- First Communications, LLC's contracts provide detailed information enabling customers to opt out of any use of CPNI for marketing services by First Communications, LLC unrelated to the services being subscribed for. Any opt out by customer will in no way affect provision of customer's service.