

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, D.C. 20554

Re: EB Docket No. 06-36

Annual Section 64-2009(e) CPNI Certification
Total Customer Services, Inc. (499 Filer ID: 823618)

Dear Ms. Dortch:

On behalf of Total Customer Services, Inc. ("Total CSI") and pursuant to 47 C.F.R. Section 64.2009(e) of the Commission's rules, I am attaching Total CSI's Annual CPNI Certification for 2019 (*covering the prior calendar year 2018*) and Accompanying Statement.

Please contact me with any questions or concerns.

Sincerely,

Tom Karalis
Senior Associate / Partner
FWA, Inc.

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

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

1. **Date filed:** 2/8/2019
2. **Name of company covered by this certification:** Total Customer Services, Inc.
3. **Form 499 Filer ID:** 823618
4. **Name of signatory:** Keith E. Watson
5. **Title of signatory:** Executive Vice-President / Controller

6. Certification:

I, Keith E. Watson, 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.

Total Customer Services, Inc. *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.

Total Customer Services, Inc. *has not received* 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: 

Print Name: Keith E. Watson

Title: Executive Vice-President / Controller
Total Customer Services, Inc.

Date: 2/1/19

**Statement of Compliance with the FCC's
Customer Proprietary Network Information "CPNI"
Rules and Regulations**

Total Customer Services, Inc.'s ("Total CSI") operating procedures certify that Total CSI is in compliance with the FCC's rules and regulations regarding Customer Proprietary Network Information (CPNI).

All of Total CSI's employees are aware that disclosure of our customers' CPNI information without obtaining the proper customer approval is a violation of the FCC's rules set forth in 47 U.S.C. 222 and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. 64.2001 through 64.2009.

Total CSI has taken the steps and has internal procedures in place so as to educate our employees through training regarding the FCC's rules and regulations as to when and where CPNI information may be released. The employees that have access to this information are aware that the FCC prohibits the disclosure of such information without the proper customer consent and as allowed by law and the FCC's rules.

- Any employee that violates Total CSI's CPNI operating procedures is subject to disciplinary action, up to dismissal.
- Total CSI mandates yearly CPNI training for all employees to ensure up to date compliance with any new regulations.
- Total CSI has implemented safeguards for our customers' protection against pretexters consistent with the FCC's requirements in Section 47 C.F.R. 64.2010.

Certification of CPNI Filing

EB-06-TC-060

EB Docket No. 06-36

ANNUAL CERTIFICATION
Customer Proprietary Network Information Procedures of
Total Customer Services, Inc.

I, Keith E. Watson, as an Officer of the company named above do hereby certify that I have personal knowledge that Total Customer Services, Inc. ("Total CSI") has established procedures regarding the Customer Proprietary Network Information related to the subscribers of Total CSI.

These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR § § 64.2001-64.2009.

Signed: 

By: Keith E. Watson
Executive Vice-President / Controller
Total Customer Services, Inc.

Date: 2/1/19

Certification of CPNI Filing**Total Customer Services, Inc.**

Total Customer Services, Inc. ("Total CSI" or "Company") hereby submits that its procedures regarding its subscribers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR § § 64.2001-64.2009.

Total CSI certifies that it protects and utilizes its customers' CPNI in compliance with the Commission's rules in 47 CFR § § 64.2001-64.2009 and does not sell or disclose subscriber CPNI to outside entities. In addition Total CSI does not disclose nor allow access by others to subscribers' CPNI for the purpose of identifying customers placing calls to competing carriers.

Total CSI Company Waiver

All employees have signed a company waiver stating that they have received annual CPNI training and are aware of the FCC's CPNI regulations as well as the related federal regulations and Total CSI's statutory responsibility to its customers. All requests for subscriber CPNI are forwarded to Senior Management personnel and any unauthorized use, sale, or disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including dismissal.

Carrier Authentication Requirements

Total CSI prohibits its employees from releasing a customer's phone call records when a customer calls except when the customer provides a password. If a customer does not provide a password, Total CSI will not release the customer's phone call records except by sending it to an address of record or by calling the customer at the telephone of record. Total CSI also provides mandatory password protection for online account access. Total CSI will provide all CPNI, including customer phone call records, to customers based on in-store contact with a valid government photo ID.

Notice to Customer of Account Changes

Total CSI notifies the customer immediately when the following are created or changed: (1) a password; (2) a back-up for forgotten passwords; (3) the address of record, or (4) an online account.

Joint Venture and Independent Contractor Use of CPNI

Total CSI requires explicit consent from a customer before disclosing their CPNI to a joint venture partner or independent contractors for the purposes of marketing communications-related services to that customer. In addition Total CSI does not disclose nor allow access by others to subscribers' CPNI for the purpose of identifying customers placing calls to competing carriers.

Business Customer Exemption

Total CSI may bind itself contractually to authentication regimes other than those described in this Section for services it provides to its business customers that have both a dedicated account representative and a contract that specifically addresses the Company's protection of CPNI.

Notice of Unauthorized Disclosure of CPNI

A notification process is established for both law enforcement and Total CSI customers in the event of a CPNI breach. Total CSI's Senior Management shall notify law enforcement of a breach of its customers' CPNI no later than seven business days after a reasonable determination of a breach by sending electronic notification to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI). Total CSI may notify the customer and/or disclose the breach publicly after seven business days following notification to the USSS and the FBI, if the USSS and the FBI have not requested to postpone the disclosure.

However, Total CSI may immediately notify a customer or disclose the breach publicly after consultation with the relevant investigative agency, if Total CSI believes that there is an extraordinarily urgent need to notify a customer or class of customers in order to avoid immediate and irreparable harm.

Additionally, Total CSI will maintain a record of any discovered breaches, notifications to the USSS and the FBI regarding those breaches, as well as the USSS and the FBI response to the notifications for a period of at least two years. These records will include, if available, the date that Total CSI discovered the breach, the date that Total CSI notified the USSS and the FBI, a detailed description of the CPNI that was breached, and the circumstances of the breach.

Opt-In / Opt-Out Approvals

Total CSI maintains records of all opt-in and opt-out approvals by customers, including a history of notices to customers. All outbound marketing campaigns are approved by the General Manager.
