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February 11, 2019  
Via ECFS Filing

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

**RE: Southern Light, LLC CPNI Certification  
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 Southern Light, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [Sthomas@inteserra.com](mailto:Sthomas@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas  
Consultant

tms: FCCx1902 Southern Light

Enclosures  
ST/im

**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:	Covering calendar year 2018
Name of company(s) covered by this certification:	Southern Light, LLC
Form 499 Filer ID:	821606
Name of signatory:	Jeffrey R. Strenkowski
Title of signatory:	Vice President, Deputy General Counsel of Governmental Affairs

1. I, Jeffrey R. Strenkowski, certify that I am Vice President, Deputy General Counsel of Governmental Affairs 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) 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.

/s/Jeffrey R. Strenkowski  
Jeffrey R. Strenkowski, Vice President, Deputy General  
Counsel of Governmental Affairs  
Southern Light, LLC

February 11, 2019  
Date

**Attachments:** Accompanying Statement explaining CPNI procedures

**Southern Light, LLC**

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (CY 2018)**

Southern Light, LLC ("the Company") provides the following as its Statement of CPNI compliance:

Southern Light, LLC provides wireline telecommunication services to carriers, businesses, government entities, and other customers.

The Company does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Therefore, the Company does not utilize the opt-in or opt-out approval processes. Should the Company elect to use CPNI in future marketing efforts, it 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.

The Company has procedures and processes in place to safeguard its customers' call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Customer Service Representatives are trained on how to authenticate customers and continually coached on safeguarding customer CPNI. The Company also has security procedures and a disciplinary process in place to prevent unauthorized access to CPNI.

The Company does not have retail locations and therefore do not disclose CPNI in-store.

Southern Light is aware of its obligation to report any breaches to law enforcement agencies via the breach reporting facility located at <https://www.cpnireporting.gov/>. Southern Light further understands that it may not notify the affected customer for seven days after reporting the breach. Uniti Fiber will retain for two years records relating to any discovered breaches.

Southern Light takes its obligations to safeguard CPNI seriously. It has trained its employees with access to CPNI on the limited purposes for which they are authorized to use CPNI, and on the critical importance of protecting CPNI from misuse or unauthorized disclosure. It is Southern Light's policy that any employee who fails to follow those policies and procedures with regard to CPNI will be subject to disciplinary action.

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

The Company did not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.