



February 11, 2019

*Filed Electronically Via ECFS*

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

Re: EB Docket No. 06-36, Annual CPNI Certification and Accompanying Statement  
for Totelcom Networks, LLC

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.2009(e), Totelcom Networks, LLC hereby submits its CPNI Certification and Accompanying Statement. If you have any questions regarding this submission please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads 'Brandi Iley'. The signature is fluid and cursive, with the first name 'Brandi' and last name 'Iley' clearly distinguishable.

Brandi Iley  
Regulatory Compliance & Billing Supervisor

**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

Date filed: 02/11/2019

Name of company: Totelcom Networks, LLC

Form 499 Filer ID: 831468

Name of signatory: Jennifer Otwell

Title of signatory: General Manager/ Vice President

I, Jennifer Otwell, 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 any 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.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, 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 represents 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

A handwritten signature in black ink, appearing to read "Jennifer Otwell", is written over a horizontal line.

**STATEMENT OF COMPLIANCE WITH THE  
FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)  
RULES**

To the best of my knowledge, Totelcom Networks, LLC ("the Company") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Company's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions 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 §64.2011.

The Company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

The Company has not taken any actions against data brokers in the past year concerning the unauthorized release of CPNI. The Company has received zero (0) customer complaints relating to the unauthorized access to CPNI, or unauthorized disclosure of CPNI. The Company realizes the industry-wide pretexting problem, and has implemented several safeguard procedures to protect its customers CPNI such as password protection and authorized user lists, to name a few.

**Company CPNI Status:** To the best of my knowledge and belief, the Company does not presently use, sell, or otherwise release CPNI for marketing or other commercial purposes. If our customers' CPNI is to be used for sales and marketing campaigns in the future, the appropriate safeguards will be implemented in accordance with 47 C.F.R. §64.2009.