



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

February 11, 2019
Via ECFS Filing

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

**RE: Talk America Services, LLC CPNI Certification
EB Docket No. 06-36; CY2018**

Dear Ms. Dortch:

Enclosed for filing please find

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 Talk America Services, 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. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant

tms: FCCx1901 TAS

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: Talk America Services, LLC

Form 499 Filer ID: 830784

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.

Jeffrey R. Strenkowski

Jeffrey R. Strenkowski, Vice President, Deputy General
Counsel of Governmental Affairs
Talk America Services, LLC

February 11, 2019

Date

Attachments: Accompanying Statement explaining CPNI procedures

Talk America Services, LLC

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (CY 2018)

Talk America Services, LLC ("TAS" or "the Company") provides the following as their Statement of CPNI compliance.

Talk America Services, LLC provides wireline local and long distance telecommunication services to residential customers, primarily as bundled services.

TAS does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Therefore, TAS 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 maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

Call detail information is provided to customers over the telephone pursuant to the procedures identified below. Customers are issued a unique PIN at the time the customer account is established, which the customer uses to set up his/her initial password. Call detail information is only disclosed over the phone if the customer can provide the appropriate password or the call detail information that is the subject of the inquiry without a customer service representative's assistance. In addition, each Customer must respond to challenge questions during the initial password set up in order to validate customer authentication. If the customer cannot provide the password and cannot specifically identify the call detail information that is the subject of the inquiry, call detail will only be provided by sending it to the customer's address of record or calling the customer back at their telephone number of record.

The Company provides online access to CPNI, and protects unauthorized disclosure through the establishment of a customer password using the same procedures described above. Customers are unable to access CPNI online without the

appropriate password. If a customer loses or forgets his/her password, an email is sent to the customer's email address of record and the customer is required to establish a new password.

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

The Company notifies customers of account changes by sending an email or letter to the email or physical address of record prior to the change, based on the customer's preferred method of contact. The notification does not reveal the changed information and is not sent to the new email or physical address.

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

The Company has procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach seven business days after notification to law enforcement. The Company maintains a record of any breaches discovered and notifications made to the USSS and FBI. The Company maintains records of any CPNI breaches, including the dates of discovery and notifications to law enforcement and customers and a detailed description of the CPNI breached and the circumstances of the breach.

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

The Company requires annual scenario-based CPNI training for its Customer Care Representatives that presents them with methods that pretexters may be using to attempt to access to CPNI.