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February 12, 2019  
Via ECFS Filing

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

RE: Network Communications International Corp  
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 Network Communications International Corp.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to [swarren@inteserra.com](mailto:swarren@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon R. Warren

Sharon R. Warren  
Consultant

cc: Stephanie Jackson - NCIC  
tms: FCx1901

SW/mp

**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 for 2019:      Covering calendar year 2018

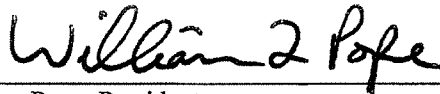
Name of company(s) covered by this certification:      Network Communications International Corp.

Form 499 Filer ID:      817994

Name of signatory:      William Pope

Title of signatory:      President

1. I, William Pope, 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.*
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 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.



\_\_\_\_\_  
William Pope, President  
Network Communications International Corp.

02-11-19

\_\_\_\_\_  
Date

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

**Statement of CPNI Procedures and Compliance  
For 2018  
Network Communications International Corp.**

Network Communications International Corp. operates solely as an operator service provider and as such provides operator assisted call completion services for incarcerated persons in correctional facilities. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship, and we do not obtain or retain any CPNI that could be used for marketing purposes.

Our marketing efforts are directed only towards correctional facilities, and such efforts do not include the use of CPNI. Should we expand our business in the future to include the provision of services that involve CPNI, we 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, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

We do not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless calling party can identify the call detail related to their inquiry. Customers (inbound callers into our Customer Service Center) are required to give the call detail information to the Customer Service Representatives as well as their names prior to providing any assistance or information. We only disclose the information requested that comes directly from the billed information. The customer must have the call detail/bill when calling and must be the name on the account.

For inquiries regarding correctional institution prepaid call account call detail, an end user must provide the credit card number used to fund the account, the billing address for the credit card, the name of the inmate, and the allowed "call to" numbers as well as the call detail in question in order to establish identity before any information regarding call detail is provided.

We do not disclose call detail on line to end users under any circumstances.

As an operator services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We have processes in place to safeguard the 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 these records. All call detail is stored in a database that is protected; only authorized NCIC personnel have access to the database. It is not accessible by anyone outside NCIC.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records. We have not had any such breaches during 2018, but we have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

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

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2018.

Due to the nature of the operator services business, the call detail we have is not tied to any presubscribed customers. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.