

Annual 47 CFR § 64.2009(e) CPNI Certification Template

EB Docket 06-36

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

1. Date filed: February 13, 2019
2. Name of company(s) covered by this certification: Freedom Telecommunications, LLC
3. Form 499 Filer ID: 826813
4. Name of signatory: Neil Dickson
5. Title of signatory: Vice President – Corporate and Commercial Transactions
6. Certification:

I, Neil Dickson, 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 CFR § 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The company *has not* taken actions against data brokers in the past year.

The company *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 CFR § 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 
Neil Dickson

Date: 2/13/19

Attachments: Accompanying Statement explaining CPNI procedures

Attachment
CPNI Certification
Freedom Telecommunications, LLC

1. Freedom Telecommunications, LLC (“Freedom”) builds and operates fiber optic networks throughout the state of California. Freedom’s policy is based upon, and compliant with, the Federal Communications Commission (“FCC”) rules and regulations under 47 U.S.C. § 222.

2. Freedom may use, disclose, or permit third party access to CPNI without prior customer approval, only under limited circumstances. Freedom may use, disclose, or permit access to CPNI to provide services to which its customers already subscribe, and it is the current policy of Freedom that customers’ CPNI will not be provided to any third parties, nor does Freedom use or allow third party access to CPNI, in any circumstances in which prior customer approval will be required. Freedom also does not currently engage in outbound marketing or cross-marketing that utilizes CPNI, or that otherwise requires prior customer approval.

3. If Freedom personnel seek to use CPNI for any sort of marketing purposes, they must first obtain appropriate approval by supervisory management and legal personnel and will comply with applicable recordkeeping requirements. Furthermore, with respect to use, disclosure, and access to CPNI within a Freedom customer’s total services, all employees, contractors and consultants employed or engaged by Freedom are required to sign, as a condition of employment or engagement, statements of confidentiality and non-disclosure pertaining to all confidential proprietary information, including CPNI. Noncompliance with Freedom’s CPNI policies can subject employees to disciplinary action up to and including termination.

4. CPNI may be used or disclosed to third parties, without customer approval, for the following purposes:

- billing and collection;
- administrative customer care services;
- maintenance and repair services;
- to protect Freedom’s rights or property, or to protect users of Freedom’s services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
- responding to a lawful law enforcement request for such information; or
- use of aggregate customer information – i.e., collective data relating to a group or category of Freedom services or customers from which individual identities and characteristics have been removed.

5. Freedom may not disclose CPNI based on customer-initiated contact by telephone or online to any entity without proper authentication. Insofar as Freedom is a carrier’s carrier it does not have access to its customers’ call detail information, but will provide CPNI over the phone only if the customer provides proper authentication. Customers’ telephone access to call detail information and online access to their CPNI generally requires a password. Freedom does not provide CPNI to customers at the retail store level. Customers are notified via mail to the address of record of changes in account information, including password, backup authentication method, online account or address of record.

6. Freedom will timely notify law enforcement and customers of any breach of its customers' CPNI in accordance with FCC rules. Records of any breaches discovered will be maintained for a minimum of two years.

7. Any proposed or desired use of CPNI inconsistent with these Policies and Procedures must be approved by Freedom senior management and subject to appropriate legal review to ensure that such use is consistent with FCC rules.