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February 13, 2019
Via ECFS Filing

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

**RE: 808phone.com LLC – CPNI Certification CY 2018
EB Docket No. 06-36**

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 808phone.com 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

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:	808Phone.com LLC
Form 499 Filer ID:	831575
Name of signatory:	Michael P. Murray
Title of signatory:	Managing Member

1. I, Michael Murray, certify that I am the Managing Member of 808Phone.com LLC (or "Company"), 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.

Michael P. Murray
Managing Member

2-12-19
Date

Attachments: Accompanying Statement Explaining CPNI Procedures

Statement of CPNI Procedures and Compliance

808Phone.com LLC

Attachment A

Statement of CPNI Procedures and Compliance

808Phone.com LLC ("808Phone" or "Company") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. 808Phone has trained its personnel not to use CPNI for marketing purposes. Should 808Phone 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.

808Phone has processes in place to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. 808Phone maintains all CPNI on a secure server and access by 808Phone employees requires a valid username and password.

808Phone does not disclose CPNI to any agents, affiliates, joint venture partners or independent contractors, nor does it use CPNI to identify or track customers who call competing providers. The Company has a strict policy prohibiting the disclosure of CPNI to any third parties, unless required to do so by law (e.g., in response to a subpoena).

808Phone does not disclose call detail over the telephone or online. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

808Phone does not maintain any retail locations.

808Phone will notify law enforcement in the event of a breach of customers' CPNI and will ensure that the customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. As soon as practicable, and no later than seven business days upon learning of a breach, the company will notify the U.S. Secret Service and the FBI by electronic means, as required by FCC regulations. 808Phone will not notify customers or disclose a breach to the public until seven business days after notification to the U.S. Secret Service and the FBI, unless it believes there is an extraordinarily urgent need to notify customers before seven days to avoid immediate and irreparable harm. In that instance, it will only notify such customers *after* consultation with the relevant investigating agency and will cooperate with the agency's request to minimize any adverse effects of the customer notification. If the Company receives no response from law enforcement after the seventh full business day, it will promptly proceed to inform the customers whose CPNI was disclosed of the breach. The Company will delay notification to customers or the public if requested to do so by the U.S. Secret Service or FBI. Notifications to law enforcement and customers are handled by a designated supervisor level employee responsible for managing the company's CPNI compliance.

808Phone will maintain written records of any breaches discovered and notifications made to the USSS and the FBI, and to customers.

808Phone has not taken any actions against data brokers in the last year.

808Phone did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2018.

808Phone has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI as described herein.