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February 13, 2018  
Via ECFS Filing

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

RE: Operator Service Company, LLC  
EB Docket No. 06-36; CY2017

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2017 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 Operator Service Company, LLC.

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: Jennifer Hinojosa - OSC  
tms: FCx1801

Enclosures  
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 2018:    | Covering calendar year 2017  |
| Name of company(s) covered by this certification: | Operator Service Company, LLC  |
| Form 499 Filer ID:                                | 811236   |
| Name of signatory:                                | Derek Rieger   |
| Title of signatory:                               | Secretary, kgb USA, Inc. Managing Member of<br>Operator Service Company, LLC |

1. I, Derek Rieger, 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.

  
\_\_\_\_\_  
Derek Rieger, Secretary  
kgb USA, Inc.  
Managing Member of Operator Service Company, LLC

2/13/18  
\_\_\_\_\_  
Date

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

**Statement of CPNI Procedures and Compliance  
For 2017  
Operator Service Company, LLC**

Operator Service Company, LLC operates solely as an operator service provider and as such provides only operator assisted call completion services for its client end users. Therefore, all of our services consist of traffic provided on behalf of our clients and outside of any subscribed service relationship with OSC. We do not obtain or retain any CPNI that could be used for marketing purposes.

We do not actively market the operator services product. We offer operator services as a bundled package often with our directory assistance services. Discussions of the operator service product are directed only towards payphone owners, hospitality locations, and Independent Local Exchange carriers (ILEC's), 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 with end users unless the 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 (from the bill they received) 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 from the bill when calling and must be the person whose name is on the account.

We do not disclose call detail on-line to end users under any circumstances. We do not have a subscriber relationship with our customers, and do not have customer accounts. We do provide on-line access to our clients (payphone owners, hospitality locations and ILEC's) via a secured FTP site. Each client receives a unique login and password in order to be able to view their customers' call detail on that site. This ensures that this information is safeguarded from other clients, customers or employees. In addition, clients calling with inquiries about their on-line data must provide the correct password to OSC personnel. Only authorized OSC personnel have access to the client passwords or to our database. We do not have a back-up authentication method in the event a password is forgotten. In that case, the primary person associated with our client account must request a new password via authorized procedures; we will then provide the new password to that individual only.

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

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 2017, 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 2017.

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.