

**Annual 47 C.F.R. § 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 covered by this certification: Parker FiberNet, LLC
3. Form 499 Filer ID: 824748
4. Name of signatory: David Parker
5. Title of signatory: Manager
6. Certification:

I, David Parker, 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.*

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 Section 64.2001 *et seq.* of the Commission's rules.

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.

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 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.

Parker FiberNet, LLC



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Attachments: Accompanying Statement explaining CPNI procedures

PARKER FIBERNET, LLC

Statement Explaining CPNI Procedures **February 13, 2019**

1. Parker FiberNet, LLC ("Parker FiberNet") offers telephone, Internet, co-location, fiber, and related services to customers in Rome, Georgia (Floyd County); Athens, Georgia (Clarke County); Cedartown/Rockmart, Georgia (Polk County); Cartersville/Tailorsville, Georgia (Bartow County); Summerville, Georgia (Chattooga County); Buchanan/Tallapoosa, Georgia (Haralson County); and LaFayette/Chickamauga/Rossville, Georgia (Walker County); Calhoun, Georgia (Gordon County); Watkinsville, Georgia (Oconee County); Douglasville, Georgia (Douglas County); Dallas/Hiram, Georgia (Paulding County); Sandersville, Georgia (Washington County); Savannah, Georgia (Chatham County); Americus, Georgia (Sumter County); Vidalia, Georgia (Toombs County); Atlanta, Georgia (DeKalb County); Griffin, Georgia (Spalding County); Dalton, Georgia (Whitfield County); and Heflin, Alabama (Cleburn County). Parker FiberNet currently has 27 employees, 219 total customers (24 of which have telephone service), and generates approximately \$513,183 in monthly revenue.

2. Parker FiberNet resells voice telephone services from local exchange carriers. Parker FiberNet also provides modified interconnected voice over Internet protocol (VoIP) service to 77 of its customers.

3. Parker FiberNet's retail telephone customers primarily consist of business customers, although in some circumstances, its telephone customers will be individual customers.

4. Parker FiberNet receives all CPNI data directly from its VoIP carriers as well as from its local exchange carriers, pursuant to its interconnection agreements with these entities, solely for the purpose of billing its customers.

5. Use of CPNI.

- a. *Billing purposes.* Parker FiberNet has engaged an independent contractor to perform billing services that are necessary to the provision of service to Parker FiberNet's customers. Parker FiberNet shares CPNI data with this billing agent only to the extent necessary for generating bills for its customers. All such disclosure of CPNI data is subject to a mutual confidentiality provision contained in the agreement between Parker FiberNet and its billing agent.
- b. *Marketing or other purposes.* Except as listed in Section 5(a), Parker FiberNet does not release any CPNI data to any third party or agent, including joint venture partners or independent contractors, without an affirmative written request by the customer. Parker FiberNet does not engage in any marketing campaigns which utilize CPNI data.

4. **Notification of CPNI security breaches.** In the past year, Parker FiberNet has not discovered and is not aware of any breaches of its customers' CPNI. In the event that Parker FiberNet discovers any breaches of its customers' CPNI, it will maintain records of such breaches and comply with all applicable notification requirements contained in 47 C.F.R. §§ 64.2001 – 64.2011.

5. Customer access to CPNI data.

- a. *Telephone access.* Parker FiberNet does not disclose any of its customers' call detail information or other CPNI data over the telephone, regardless of whether its customers have initiated the telephone contact.
- b. *Online access.* Parker FiberNet does not offer any form of online access to its customers' service accounts. Parker FiberNet's customers therefore have no means to access CPNI data online.
- c. *In-store access.* Parker FiberNet does not have any retail locations and therefore does not provide in-store access to CPNI data.