



151 Southhall Lane, Ste 450  
Maitland, FL 32751  
P.O. Drawer 200  
Winter Park, FL 32790-0200  
[www.inteserra.com](http://www.inteserra.com)

February 14, 2019  
**Via ECFS Filing**

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

RE: Custom Network Solutions, Inc.  
EB Docket No. 06-36; CY 2018

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 the Custom Network Solutions, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to [croesel@inteserra.com](mailto:croesel@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Carey Roesel

Carey Roesel  
Consultant

cc: Marc Rozar - CNS  
tms: FCCx1901

Enclosures  
CR/gS

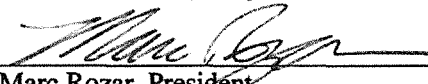
**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB DOCKET 06-36**

Annual 64.2011(e) CPNI Certification for 2019:	Covering Calendar Year 2018
Name of Company covered by this certification:	Custom Network Solutions, Inc.
Form 499 Filer ID:	813213
Name of Signatory:	Marc Rozar
Title of Signatory:	President

I, Marc Rozar, certify and state that:

1. I am President of Custom Network Solutions, Inc. 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, as Exhibit A, 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.
3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the 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 any 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.

  
\_\_\_\_\_  
Marc Rozar, President  
Custom Network Solutions, Inc.  
  
2/13/19  
\_\_\_\_\_  
Date

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A

Attachment A

Statement of CPNI Procedures and Compliance

**Custom Network Solutions, Inc.**

Covering Calendar Year 2018

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB DOCKET 06-36**

---

Custom Network Solutions, Inc.

**Statement of CPNI Procedures and Compliance**

Custom Network Solutions, Inc. ("Company" or "CNS") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. CNS has trained its personnel not to use CPNI for marketing purposes. Should CNS 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.

CNS Customer Service personnel do not release CPNI or call detail information to incoming callers. CNS Customer Service representatives call the authorized Customer Contact at their Business Telephone Number to release customer requested CPNI. CNS will only release CPNI or call detail information to third parties after receiving both written and verbal consent from the authorized Customer Contact.

Customers are notified of account changes without revealing the change information or sending the notification to a changed or new account contact. This is done via telephone to the Customer Contact of record. All requests from customers for information must be made via email from the company's authorized representative from their company email address, or CNS will call the authorized person at the company telephone number.

CNS has a webmail link and a broadband link on its website. The only information customers can obtain through these portals is Internet Utilization reports, which are nothing more specific than a summary report of total data usage. Access is via customer provided password. CNS does not disclose CPNI on-line. 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 or account information and customer notification of account changes.

CNS does not have retail locations and therefore does not allow in-store access to CPNI.

CNS has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI.

Custom Network Solutions, Inc.

Statement of CPNI Procedures and Compliance  
(Page 2)

Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

CNS maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that 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. Such procedures require notification and management of the process by the Company President.

The Company has not taken any actions against data brokers in calendar year 2018.

The Company did not receive any complaints about unauthorized release or Disclosure of CPNI during 2018.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.