

From:
Millennium Telecom LLC
102 Hartman Drive
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Lebanon, TN 37087

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January 24, 2019

Attn:
Marlene H. Dortch,
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554
(Reference EB Docket No. 06-36)

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I, Daniel M. Mack, 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.*

This letter is intended to explain company's procedures that are in place to ensure that the Millennium Telecom is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Millennium Telecom is a small Non-Facility Based Reseller of the following services sold only to selected non-residential business pursuant to individual contract and is not offered to the public at large.

- Dedicated Interstate Access
- MPLS Circuits
- Conference Calling Services

Since before we began providing services our entire company staff has consisted of only two individuals. We together have reviewed the requirements of 47 C.F.R. § 64.2001 and have verbally communicated our policy of not using and not sharing any records of any kind that pertains to any type of service that we provide to our customers. This has in fact been our practice since our inception in 1999. Millennium Telecom achieved revenues resulting in a de minimus status until our first 499A filing in April 2007

Millennium does not directly provide any local dial tone or local voice services to our customers. We do act as agents for several Carriers and / or Local Exchange Carriers when business prospects require voice services we cannot provide directly through Millennium Telecom LLC. As agents for these commission sales we receive only commission income and do not keep or have access to any customer records in regard to these services.

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If any additional employees, or any individuals contracting with Millennium, may have access to customer information of any kind, they will be required to sign a confidentiality agreement specifically stating the extreme privacy of this information. Our internal documentation will clearly state our company policy not to use this information internally for marketing purposes as well as our policy not to share this information with anyone or any entity.

This policy statement will be endorsed by all present and future Millennium employees or contracted associates who may have access to customer information of any kind, and all will be required to sign a confidentiality agreement specifically stating our company policy. Millennium Telecom will adhere to a policy that any employee or contractor for Millennium Telecom LLC will have their employment terminated as a result of non-compliance of this company policy.

To date Millennium Telecom has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Millennium Telecom LLC has not used CPNI nor have we sought customer approval of the use of CPNI since CPNI. Millennium Telecom LLC also has not used CPNI in any internal sales or marketing campaign.

As Millennium Telecom only provides services under private individual contract to business customers and not to the public at large, it does not believe that it is subject to the Commission's reporting rule. Millennium Telecom provides this certification as a courtesy, however, and out an abundance of caution in the event the rules are deemed to apply.

Please call anytime it is necessary @ 877-797-5562

Sincerely,



Daniel M. Mack
President
Millennium Telecom LLC
877-797-5562