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## Memorandum

**TO:** Marlene H. Dortch, FCC  
**FROM:** Lesly Jordan, Finance Adm  
Metronet Telecom Inc.  
**DATE:** 01.22.2019  
**SUBJECT:** CPNI 2018 submission

Please be advised that I have attached the above submission in addition to the online filing to insure that this was received.

The confirmation # is 20190122410403420

Thank you for your time and assistance.

Regards,

Lesly Jordan  
Finance Administrator  
Metronet Telecom Inc.  
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Annual 47 C.F.R. & CPNI Certification

EB Docket No. 06-36

Annual CPNI Certification for 2018

Date Filed: January 22, 2019

Name of Company covered by this certification:

Metronet Telecom Inc.

Form 499 Filer ID: 823104

Name of Signatory: David J. Choma

Title of Signatory: President

I, David J. Choma, 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 set for in section 64.2001 *et seq* of the Commission's rules.

The company has not taken any actions (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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative:

Signed

A handwritten signature in cursive script, appearing to read "David J. Choma", written over a horizontal line.



METRONET TELECOM INC.

STATEMENT OF CPNI OPERATING PROCEDURE

Metronet Telecom Inc. provides this statement pursuant to Section 64.2009(c) of the Federal Communications Commission rules to summarize the operation procedures and policies in place that are designed to ensure compliance with the Commission's Customary Proprietary Network Information (CPNI) rules.

**Use of CPNI:**

Metronet's policy is not to use, disclose or permit access to its customers' CPNI except as permitted without customer approval or as otherwise permitted by law, and only to the extent necessary. Specifically, Metronet may use CPNI to render, provide bill and collect for the services from which the CPNI is derived. Metronet also will use CPNI to protect its property rights, or to protect its customers and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such service. Metronet may also use CPNI to provide administrative services to the customer for the duration of the call, if the customer initiated the call and the customer approves of the use of such information to provide those services.

**Employee Training:**

Metronet trains its personnel regarding the confidentiality of customer information, including what information is classified as CPNI and when its employees are authorized and are not authorized to use this information. Metronet also trains its employees regarding the appropriate authentication methods, addressing account changes, responding to security breaches, among other measures.

Metronet documents employee's misuse of CPNI.

**Breach of Data Security:**

In the unlikely event of a security breach, Metronet is aware of the law enforcement agencies required to contact and will follow protocol in conjunction with their instructions. Metronet will maintain a record of a breaches discovered, notifications to law enforcement and customers in accordance with the Commission's requirements.

**Safeguards to protect CPNI:**

Metronet directs its employees to discover activity that is indicative of pretexting and to take measures to protect against pretexting. Metronet authenticates all callers in accordance with the Commission's rules. Metronet prohibits the release of call detail information during an in-bound call.

Metronet will report all customer complaints to the Commission, breaking down by category and providing a summary of the complaints in its annual certification to the FCC.

Metronet will notify customers immediately of certain account changes, including changes in the customer's address of record. Metronet does not permit customers to access their accounts online, and, therefore, the notification requirements regarding online account access are not applicable.