

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**



**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018 covering the prior year 2017

Date filed: 02/15/2018

Name of company covered by this certification: Lafayette City Parish Consolidated Government ("Lafayette")

Form 499 Filer ID: 823920

Name of signatory: Chad Governale

Title of signatory: CPNI Compliance Officer

I, Chad Governale, certify that I am the CPNI Compliance Officer for Lafayette City Parish Consolidated Government, 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.*

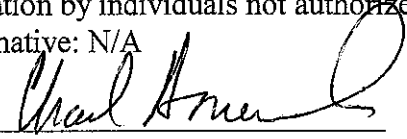
Attached to this certification is an accompanying checklist demonstrating how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. (See attachment A)

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.

If affirmative: N/A

The company has not received any customer complaints in the past year concerning the 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: N/A

Signed: 

Chad Governale  
CPNI Compliance Officer  
Lafayette City Parish Consolidated Government

**Attachment A**  
**CPNI Checklist**

- ✓ Lafayette City Parish Consolidated Government has chosen to prohibit the use of CPNI for marketing purposes between itself and its affiliates, if any.
- ✓ Lafayette City Parish Consolidated Government's Policy Manual(s) has/have been updated to include CPNI.
- ✓ Employees have been trained on the FCC CPNI rules and Lafayette City Parish Consolidated Government's penalties for non-compliance and their signed acknowledgements have been obtained and filed.
- ✓ Employees who might need to access Customer Service Records (CSR) stored in the OSS of other carriers/service providers have been provided a copy of Lafayette City Parish Consolidated Government's CSR Policy, including penalties for non-compliance, and their signed acknowledgements have been obtained and filed. (CSR Policy requires written customer authorization prior to accessing CSR data as part of the new customer sales process).
- ✓ Lafayette City Parish Consolidated Government requires written approval for release of CPNI to third parties.
- ✓ Customer Notice and Authorization forms are readily available to Company employees / Compliance Officer for distribution to customers upon request.
- ✓ Lafayette City Parish Consolidated Government has chosen to use authorized CPNI for marketing.
- ✓ Lafayette City Parish Consolidated Government provides CPNI education material to customers annually.
- ✓ Lafayette City Parish Consolidated Government will require a password for any customer-initiated telephone contact where call detail information is being requested. If the password can not be provided the call detail information will be mailed to the address of record, or, by calling the customer at the telephone number of record.
- ✓ A Corporate Officer has been named as the Lafayette City Parish Consolidated Government CPNI Compliance Officer and will certify annually that Company is in compliance with all Federal CPNI rules and will make the required annual filing to the FCC.
- ✓ Safeguards are in place with all third parties having access to Lafayette City Parish Consolidated Government customer data or responsibility for creation of Lafayette City Parish Consolidated Government customer data. All applicable parties have attested to their compliance with FCC CPNI Rules and their attestations are on file.

- ✓ Safeguards are in place to obtain the explicit consent of a customer before disclosing a customer's CPNI to a joint venture partner or independent contractor for the purpose of marketing communications-related services to that customer.