

**SMART CITY SOLUTIONS, LLC d/b/a SMART CITY COMMUNICATIONS**

**P. O. Box 22856, Lake Buena Vista, Florida 32830-2856 (407) 828-6900**

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2017

Date signed: February 16, 2018

Name(s) of Company Covered by this Certification:

499 Filer ID

Smart City Solutions, LLC d/b/a Smart City Communications

824094

Name of signatory: James T. Schumacher

Title of signatory: Vice President - Finance

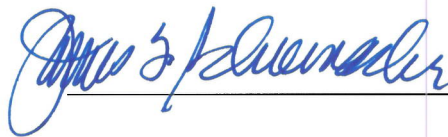
I, James T. Schumacher, certify that I am an officer of the company named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). 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 forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement. The Company did not take any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2017. Additionally, the Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has nothing to report respecting processes pretexters use in attempts to gain access to CPNI.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI and thus has nothing to report respecting pretexters use in attempts to gain access to CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with Commission rules.



Attachment

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499 Filer ID 824094

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## 2017 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE

February 16, 2018

This statement serves to explain how Smart City Solutions, LLC d/b/a Smart City Communications (“Company”), is complying with Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 64.2000-2011).

*All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.*

*As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.*

### 1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

### 2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

### 3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

### 4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

### 5. Customer Notification and Authorization Process

The Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out process. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process. The Company has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for

marketing, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

**6. Record of Customer CPNI Approval/Non-Approval**

At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

**7. Procedures Protecting Against Disclosure of CPNI**

The Company has established procedures appropriate for compliance with Section 64.2010 including, but not limited to the following:

authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits;

procedures and processes to control customer access to on-line account information in compliance with Section 64.2010(c), comprising authentication through a password established in compliance with Section 64.2010(e) together with password back-up authentication procedures in compliance with Section 64.2010(e); and implementation of procedures to notify customers of account changes.

**8. Actions Taken Against Data Brokers and Responses to Customer Complaints**

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

<u>Not applicable.</u>	No actions taken against data-brokers during year.
	No customer complaints received during year.

**9. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

**10. Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

**11. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.