



Via Electronic Filing

February 15, 2019

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36, Certification of CPNI Compliance Filing

Dear Ms. Dortch:

Attached is the 2018 CPNI Certification for EnTelegent Solutions, Inc.

If there are any questions, I can be reached at 704-909-6410.

Sincerely,

Michael Ruziska
Vice President

A handwritten signature in black ink, appearing to read 'Michael Ruziska', written over a horizontal line.

Attachments

ANNUAL 47 C.F.R. § 64.2009(e) CPNI CERTIFICATION

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019: Covering calendar year 2018

Date Filed: February 15, 2019

Name of company(s) covered by this certification: EnTelegent Solutions, Inc.

Form 499 Filer ID: 827572

Name of signatory: Michael Ruziska

Title of signatory: Vice President

1. I, Michael Ruziska, 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.*

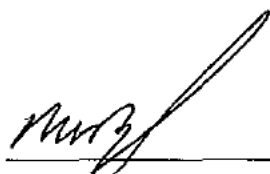
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.

3. The company has not taken actions (*i.e.*, 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. The Company has taken steps to protect CPNI from unauthorized access.

4. The company has not received 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.

Signature: _____

A handwritten signature in black ink, appearing to read "MRuziska", is written over a horizontal line.

ENTELEAGENT SOLUTIONS, INC.

2018 ANNUAL STATEMENT OF FCC CPNI PROCEDURES AND RULE COMPLIANCE

USE OF CPNI

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

PROTECTION OF CPNI

EnTelegent has put into place processes to safeguard its customers' CPNI/call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Should a customer call in requesting information who is not the recognized and authorized contact on the account, EnTelegent requires the request to be in writing and transmitted via fax. Once received, it is determined if the fax belongs to the customer, and the company will call the customer back at the number of record with the requested information.

Although it has never occurred, EnTelegent will maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

DISCLOSURE OF CALL DETAIL OVER PHONE

Company does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative. 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 information or account information and customer notification of account changes.

Company has put into place procedures to notify customers whenever an online account or address of record is created or changed without revealing the changed information or sending the notification to the new account information. This notification is made via telephone call to the customer's number of record.

DISCLOSURE OF CPNI ONLINE

EnTelegent has instituted authentication procedures to safeguard the disclosure of CPNI on-line. EnTelegent's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Customers wishing to have online access to billing information are required to establish a password and security question, without the use of readily available biographical information or account information, at the time of account set up. Unless the appropriate password is provided, EnTelegent does not allow on-line access to CPNI.

EnTelegent has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. If the security question is answered correctly, a new password can be established. If this fails, EnTelegent will call the customer back at the number of record before providing a password reset.

DISCLOSURE OF CPNI AT RETAIL LOCATIONS

EnTelegent does not disclose CPNI at any retail locations.

NOTIFICATION TO LAW ENFORCEMENT

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.

Although it has never occurred, EnTelegent will maintain records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

ACTIONS AGAINST DATA BROKERS

Company has not taken any actions against data brokers in the last year.

CUSTOMER COMPLAINTS ABOUT CPNI BREACHES

Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2018.

INFORMATION ABOUT PRETEXTERS

Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to diligently protect CPNI.