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February 21, 2019  
Via ETFS Filing

Ms. Marlene H. Dortch, FCC Secretary  
Federal Communications Commission  
9050 Junction Drive  
Annapolis Junction, MD 20701

RE: Pay Tel Communications, Inc.  
EB Docket No. 06-36; CY2018

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Pay Tel Communications, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to [swarren@inteserra.com](mailto:swarren@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon R. Warren

Sharon R. Warren  
Consultant

cc: J. Vincent Townsend - Pay Tel Communications, Inc. (Via Email)  
tms: FCx1901

SW/mp

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

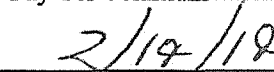
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019:	Covering calendar year 2018
Name of company(s) covered by this certification:	Pay Tel Communications, Inc.
Form 499 Filer ID:	802377
Name of signatory:	Vincent Townsend
Title of signatory:	CEO

1. I, Vincent Townsend, 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 in the past year.
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.



\_\_\_\_\_  
Vincent Townsend, CEO  
Pay Tel Communications, Inc

  
\_\_\_\_\_  
Date

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

**PAY TEL COMMUNICATIONS, INC.**

**2018**

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

Pay Tel Communications, Inc. operates as an institutional service provider offering operator-assisted call completion services for use by inmates and other incarcerated persons pursuant to contract with confinement facilities. All of our services consist solely of casual traffic provided outside of any subscribed service relationship. We do not have any information that relates to the quantity, technical configuration, type, or location of the called party's presubscribed services. Because our service is provided outside of any presubscribed service relationship, we do not obtain any Customer Propriety Network Information (CPNI) that can be used for marketing purposes.

Our marketing efforts are directed only toward the confinement facilities and such efforts do **not** include the use of any end user's personal information or telephone call detail. Should we expand our business in the future to include the provision of services that involve CPNI, we 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, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

As set forth below, we have processes in place to safeguard 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 call detail.

Pay Tel has safeguards in place to protect against disclosure of call detail information to unauthorized persons. Pay Tel does not disclose call detail information in response to customer-initiated telephone contact or online access, unless the customer provides the appropriate personal identification number (PIN) for the prepaid account in question, and we can verify it against our records. All customer service personnel are trained not to discuss call detail information unless the caller provides the required PIN. Customer service personnel must learn our company privacy policy and CPNI policy thoroughly. Violation of these policies subjects the employee to disciplinary action, up to and including immediate dismissal.

If a PIN is lost or forgotten, we have a back-up authentication method that does not involve the use of readily available biographical information. The customer must establish a new PIN via Pay Tel's website or provide proof of identity via fax or US Mail. Proof of identity must include a copy of the customer's driver's license and most recent bill or statement. We do not initiate changes to customer account information.

We have had no occasions where call detail or CPNI was disclosed to third parties, but we do have procedures in place to maintain records of any such disclosures. Any requests for call detail by outside parties must be accompanied by a court-ordered subpoena or search warrant, or clearance from the correctional facility that owns the records.

Pay Tel has no retail locations and therefore does not disclose CPNI in-store.

We have procedures in place to notify law enforcement in the event of a confirmed breach of the call detail records. We have not had any such breaches during 2018, but we have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

We have not taken any actions against data brokers in the last year.

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

Due to the nature of the specialized services Pay Tel provides, the call detail we have is not tied to any presubscribed customers. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.