

Annual 47 CFR § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 & 2018 covering the prior calendar year 2018 & 2017

1. Date filed: February 20, 2019
2. Name of company(s) covered by this certification: Star Telephone Company, Inc.
3. Form 499 Filer ID: 809782
4. Name of signatory: Jeremy Smith
5. Title of signatory: President
6. Certification:

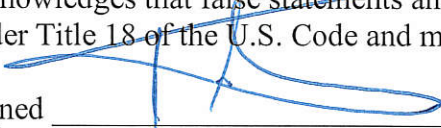
I, Jeremy Smith, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 CFR § 64.2001 *et seq.*

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

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 not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 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.

Signed 

Jeremy Smith
President, Star Telephone Company, Inc.

Attachments: Accompanying Statement explaining CPNI procedures



CPNI COMPLIANCE ACCOMPANYING STATEMENT

Year: 2018 & 2019

Star Telephone Company, Inc. (Form 499 Filer ID: 809782)

This accompanying statement explains how the operating procedures of Star Telephone Company, Inc. ensure that the Company is in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

Star Telephone Company, Inc. adheres to all CPNI rules as stated in §64.2001 – 64.2011 concerning the proper use of our customers' CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in §64.2008. To further protect our customers' privacy, we have implemented all safeguards required in §64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of Star Telephone Company, Inc. policies and procedures to ensure compliance with the federal CPNI rules.
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms do not work properly to such a degree that customers' inability to opt-out is more than an anomaly.

Customer notifications are sent as required by the regulation. Additionally, customers are informed of their rights under the regulation as prescribed and additionally on a periodic basis.