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February 22, 2019  
Via ECFS Filing

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

**RE: Certain Communications Corporation  
EB Docket No. 06-36; CPNI Certification CY 2018**

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 Certain Communications Corporation.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to [cwrightman@inteserra.com](mailto:cwrightman@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/Connie Wightman

Connie Wightman  
Consultant

tms: FCx1901

Enclosures  
CW/im

**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	Covering calendar year 2018
<b>Name of company(s) covered by this certification:</b>	<b>Certain Communications</b>
<b>Form 499 Filer ID:</b>	<b>827555</b>
Name of signatory:	Todd Steiner
Title of signatory:	Chief Financial Officer

1. I, Todd Steiner, 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.
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.

  
\_\_\_\_\_  
Todd Steiner, Chief Financial Officer

\_\_\_\_\_  
Date

2/22/2019

**Attachments:**      Accompanying Statement explaining CPNI procedures

Exhibit A  
Statement of CPNI Procedures and Compliance

## **CERTAIN COMMUNICATIONS CORPORATION**

### **STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

Certain Communications Corporation's ("Certain") main business focus is the provisioning of Interexchange Toll Services on a wholesale basis. Therefore, the company is not providing any services where they are involved in the collection or billing of CPNI type information but only act as a traffic conduit for end-user service providers

Certain does not use or permit access to CPNI to market any telecommunications or non-- telecommunications services. Notwithstanding the services that the company offers, Certain has trained its personnel not to use CPNI for marketing purposes. Should Certain 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.

Certain has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

Although Certain never has had an instance where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI , it still has procedures in place to track these instances , and notify the appropriate agencies, should they occur. Certain has processes in place to safeguard the 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 these records. All call detail is stored in a database that is protected; only authorized Certain personnel have access to the database. It is not accessible by anyone outside the company.

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 in the past year. Additionally, the Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.