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February 22, 2018  
Via ECFS Filing

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

RE: Combined Public Communications, LLC  
EB Docket No. 06-36; CY2017

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2017 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 Combined Public Communications, LLC.

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: Cathie Engle - CPC  
tms: FCx1801

Enclosures  
SW/mp

**EB Docket 06-36**

Date \_\_\_\_\_

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

**Statement of CPNI Procedures and Compliance  
For 2017  
Combined Public Communications, LLC**

Combined Public Communications, LLC operates solely as an inmate service provider and as such provides only operator assisted call completion services for transient end users. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship, and we do not obtain or retain any CPNI that could be used for marketing purposes.

Our marketing efforts are directed only towards correctional facilities, and such efforts do not include the use of CPNI. 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.

We do not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless calling party can identify the call detail related to their inquiry.

We do not disclose call detail on line to end users under any circumstances. Call detail is always required to be made available to correctional facility management personnel, and who control their own access to it.

As an inmate services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We have 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. Employees are required to sign a statement that they have read and understand the operating procedures for customer inquiries. The procedures are set forth on the statement.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records. We have not had any such breaches during 2017, 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 2017.

Due to the nature of the inmate calling services business, 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.