Access America

TELEPHONE COMPANY, A SERVICE OF TELE-SYS, INC.

February 23, 2017

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

Re: Annual 47 CFR 64.2009(e) CPNI Certification for 2017
EB Docket No. 06-36
Date filed: February 23, 2017
Name of company covered by this certification: Tele-SyS, Inc.
Form 499 Filer ID: 804813
Name of signatory: Curtis S. Jamison
Title of signatory: President

Dear Ms. Dortch:

I, Curtis S. Jamison, certify that I am an officer of Tele-SyS, Inc., and 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.*

Accompanying Statement

Attached to this certification is an accompanying statement explaining how the Tele-SyS, Inc.'s procedures ensure that the Tele-SyS, Inc. is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Federal Communications Commission's rules (see attached Accompanying Statement).

No actions have been taken against data brokers

Tele-SyS, Inc. 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) against data brokers in the past year. Tele-SyS, Inc. understands that the under the FCC's rules, companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI (see attached Accompanying Statement).

No customer complaints

Tele-SyS, Inc. has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Sincerely,

Curtis S. Jamison
President, Tele-SyS, Inc.

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Accompanying Statement for Tele-SyS, Inc.

I, Curtis S. Jamison, certify that Tele-SyS, Inc. is aware of, complies with, and has procedures that ensure that our company is in compliance with 47 U.S.C. Section 222 and 47 CFR 64, Subpart U, Customer Proprietary Network Information (CPNI). Tele-SyS, Inc. is a Tennessee corporation located at 673 Emory Valley Road, Oak Ridge, Tennessee 37830. Tele-SyS, Inc. does business as Access America (Tele-SyS, Inc. d/b/a Access America), is a small, single-entity company and provides services primarily to business customers. Tele-SyS, Inc. uses CPNI primarily to provide inside wiring, maintenance and repair services, and as such, Tele-SyS, Inc. uses CPNI in accordance with 47 CFR 64.2005 "Use of customer proprietary network information without customer approval." Tele-SyS, Inc. does not use CPNI as the basis for sales or marketing campaigns. In response to occasional customer inquiries about services other than landline telecommunications services, such as internet services, Tele-SyS, Inc., uses CPNI in accordance with 47 CFR 64.2008 "Approval required for use of customer proprietary network information" and requests verbal approval to use CPNI and logs this temporary approval to use the customer's CPNI to discuss other services. Tele-SyS, Inc. has systems and procedures for disclosure of CPNI to authorized parties. For example, we require a signed letter of authorization from the customer before disclosure of CPNI to a third-party, as in the case of a customer service record request from another telecom carrier. Tele-SyS, Inc. requires a subpoena before disclosing any CPNI to law enforcement authorities. Tele-SyS, Inc. does not sell CPNI to any marketing firm or any other third-party including, but not limited to, data brokers. Tele-SyS, Inc. does not use third-party marketing firms or independent contractors for marketing or sales campaigns. Tele-SyS, Inc. is very rarely asked to provide call detail records in any form other than in the monthly invoices which are sent to the customer location. If a customer requests call detail records, Tele-SyS, Inc. employees are trained to not provide call detail records to customers unless the customer is authenticated by a password, or to provide call records by calling the customer back at their location or by mailing the information to a customer's authorized location. Tele-SyS, Inc. employees undergo training and are trained in appropriate uses of CPNI in order to provide customer service, including trouble-ticketing and repair services to customers and understand that inappropriate uses of CPNI will not be tolerated and are a violation of Federal law. Tele-SyS, Inc. has a disciplinary procedure in place in the case of inappropriate use of CPNI that involves managerial meetings with the employee responsible, re-training, and if necessary, termination of the employee. Tele-SyS, Inc. has trained employees to understand methods, be aware of, and guard against "pretexting." There have been no attempts by pretexters to gain access to CPNI in the past year. Tele-SyS, Inc. is aware of the notification requirements for law enforcement in the case of an unauthorized breach of CPNI and has managerial procedures in place for notification to the United States Secret Service and the Federal Bureau of Investigation. These operating procedures ensure that Tele-SyS, Inc is in compliance with 47 U.S.C. Section 222 and 47 CFR 64, Subpart U-Customer Proprietary Network Information.

Curtis S. Jamison, President, Tele-SyS, Inc.

2/23/2017
Date