

ANNUAL 47 C.F.R. § 64.2009(e) CERTIFICATION
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior Calendar Year 2018

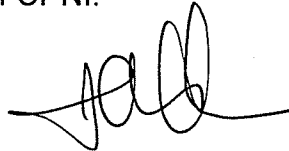
1. **Morris Communications, Inc**
2. Date filed: February 25, 2019
3. Form 499 Filer ID: 812163
4. Name of signatory: Jeff Chalmers
5. Title of signatory: Senior Vice President & Chief Financial Officer
6. Certification

I, Jeff Chalmers, hereby certify that I am a duly authorized officer of **Morris Communications, Inc. ("Morris")**, and, acting as an agent of Morris Communications, Inc. that I have personal knowledge that **Morris Communications, Inc.** has established operating procedures that are adequate to ensure compliance with the rules of the Commission's CPNI rules. See § 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 in section 64.2001 et seq. of the Commission's rules.

The Company has not taken any actions i.e., proceeding 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 any customer complaints in the past year concerning the unauthorized release of CPNI.



Jeff Chalmers
Senior Vice President & Chief Financial Officer
Morris Communications, Inc.

Attachments:

Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

**STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. PART 64 SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)
FEBRUARY 25, 2019**

The following statement explains how the operating procedures of **Morris Communications, Inc. ("Morris")** ensure that it is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. Part 64 Subpart U and is relevant to the rule in effect during calendar year 2018.

Morris does not compile call detail information transmitted to a local paging switch, nor can it trace pages through its systems. Morris thus does not maintain or provide call detail information of any sort. For non-call detail CPNI, Morris authenticates the account through a standard verification process by obtaining the customer's account number and or pager number prior to proceeding with the call.

Morris does not presently use, disclose, or permit access to individually identifiable CPNI in order to market services to its customers outside a customer's total services, and its policies restrict such use of CPNI for such purposes other than the marketing of CMRS and related CPE and information services. Should the company decide in the future to use, disclose, or permit access to CPNI in a manner that requires prior customer approval, we will comply with the applicable notice and consent requirements of the FCC's rules.

Should Morris decide in the future to use, disclose, or permit access to CPNI in a manner that requires prior customer approval, we will comply with the applicable notice and consent requirements of the FCC's rules.

All of the company's proprietary data bases, including that containing customer information, are password protected, and access to same is limited to authorize personnel only. Distribution of the password is limited to those authorized personnel. The password will be changed routinely and whenever employees with access to such data bases leave the Company.

Morris employees, including marketing and sales personnel and customer service representatives, have been educated about CPNI, federal regulations regulating the use and disclosure of CPNI and Morris's statutory responsibility to its customers. Specifically, Morris does not sell, rent or otherwise disclose customers' CPNI to other entities, and it does not currently use, or allow its affiliates to use, any customer CPNI in marketing activities. Company policy provides that any employee found in violation of Morris Communications' CPNI policy will be subject to disciplinary action, up to and including termination of employment.

Furthermore, Morris has implemented appropriate safeguards for the disclosure of CPNI, including instituting procedures to: (1) authenticate customers prior to disclosure of CPNI based on customer-initiated telephone contact or online account access and (2) providing information to customer of account changes. Morris requires all new customers establishing on-line access to provide account number, billing zip code and their pager number to authenticate a customer prior to allowing first time customer's access online to their account. A password is established at the initial on-line activation process and is a required field for all future visits.

Morris must provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(a) The notice shall be in the form of a letter, and shall include Morris' name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(b) Such notice must be submitted even if Morris offers other methods by which consumers may opt-out.

ATTACHMENT

ACTIONS TAKEN AGAINST DATA BROKERS IN 2018

Forum	Description of Action(s)
Court	None
State Commissions	None
FCC	None

SUMMARY OF CUSTOMER COMPLAINTS CONCERNING UNAUTHORIZED RELEASE OF CPNI IN 2018

Nature of Complaint	Total Number
Improper Access by Employees	None
Improper Disclosure to Unauthorized Individuals	None
Improper Access to Online Information by Unauthorized Individuals	None
Other	None

PRETEXTERS' ATTEMPTS TO ACCESS CPNI AND STEPS TO PROTECT CPNI FROM PRETEXTERS

Morris Communications, Inc. has no additional information beyond what has already been reported to the FCC and to Congress with respect to pretexters' practices. As reported in the foregoing statement, Morris Communications, Inc has timely achieved compliance with the FCC's rules adopted in its April 2007 Order.