



Annual 47 C.F.R § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2018

Date Filed: February 18, 2019

Name of company covered by this certification: Volunteer First Services, LLC.
(d/b/a Ben Lomand Connect)

Form 499 File ID: 824936

Name of signing officer: Lisa Cope

Title of signatory: President

CERTIFICATION

I, Lisa Cope, hereby 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 Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

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 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 date brokers) against date brokers in the past year.

The company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represented 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.



Name: Lisa Cope

Title: President

Date: 2/18/19

Attachment: Accompanying Statement explaining CPNI procedures

STATEMENT

Volunteer First Services, LLC. (Volfirst) D/B/A Ben Lomand Connect has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network ("CPNI").

- Volunteer First Services, LLC. has adopted a manual and keeps it updated with FCC CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Volunteer First Services, LLC. continually educates and trains its employees regarding the appropriate use of CPNI. Volfirst has established disciplinary procedures should an employee violate CPNI procedures established by Volfirst.
- Volfirst has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Volfirst maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Volfirst also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Volfirst has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Volfirst's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Volfirst has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Volfirst's retail locations, electronically or otherwise. In connection with these procedures, Volfirst has established a system of personal identification numbers (PINs), passwords and back-up authentication methods for all customer and accounts, in compliance with the requirements of applicable Commission rules.
- Volfirst has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.
- Volfirst has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Volfirst took the following actions against debt brokers in 2018, including proceedings instituted or petitions filed by Volfirst at a state commission, in the court system, or at the Federal Communications Commission:

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- The following is information Volfirst has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: _____
 - The following is a summary of all customer complaints in 2018 regarding the unauthorized release of CPNI:
 - Number of customer complaints Volfirst received in 2018 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: 0
 - Category of complaint:
 - __0__ Number of instances of improper access by employees
 - __0__ Number of instances of improper disclosure to individuals Not authorized to receive the information
 - __0__ Number of instances of improper access to online information by individuals not authorized to view the information
 - __0__ Number of other instances of improper access or disclosure
 - Summary of customer complaints received in 2018 concerning the Unauthorized release of CPNI: