



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

February 26, 2019
Via ECFS Filing

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

**RE: Dollar Phone Enterprise, Inc.
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 Dollar Phone Enterprise, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant

cc: Aaron Schulman - DPE
tms: FCx1901

Enclosures
ST/im

EB Docket 06-36

Attachments: Accompanying Statement explaining CPNI procedures

Attachment A
Statement of CPNI Procedures and Compliance

Dollar Phone Enterprise, Inc.

Statement of CPNI Procedures and Compliance

Dollar Phone Enterprise, Inc. ("DPE" or "the Company") operates solely as a prepaid calling card provider which furnishes Personal Identification Numbers ("PINs") to distributors, who in turn sell the prepaid calling cards to end users. As such, DPE provides casual calling services to transient users with whom it does not have a subscriber relationship. Therefore, it does not have any information that relates to the quantity, technical configuration, type, or location of the prepaid card holder's service and does not even know their billing name and address. Because the service is provided outside of any subscribed service relationship, the Company does not obtain any CPNI that can be used for marketing purposes. Should DPE expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U.

DPE does have call detail information concerning the calls made using the Company's prepaid calling cards. A prepaid card holder can access a limited amount of call detail (date, destination and duration of calls made) via the Company's Integrated Voice Response system by entering the PIN assigned to that prepaid card. If the prepaid card holder does not enter the PIN or enters an incorrect PIN, no call detail information will be provided. The PIN's are randomly generated and are not associated with readily available biographical information or account information. No call detail information is provided by live customer service representatives, nor is call detail made available to prepaid card holders online or in person.

The Company has processes in place to safeguard the call detail information that it obtains through the use of its prepaid calling cards 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 records are maintained on password protected secure servers behind firewalls. Customer service representatives are not permitted to provide call detail records over the phone under any circumstances and prepaid card holders can only obtain limited call detail information in the manner described previously.

The Company has procedures in place to notify law enforcement in the event of a breach of call detail records. As the Company does not have any presubscribed customers, it cannot notify prepaid card holders of any such a breach. As soon as practicable, and in no case later than seven business days upon learning of a breach, the company will notify the U.S. Secret Service and the FBI by electronic means, as required by FCC regulations.

The Company will maintain electronic records of any breaches that are discovered and of notifications made to the USSS and the FBI for a period of at least two years. Information regarding any breaches and notifications will be maintained by a designated supervisor level employee responsible for managing the company's CPNI compliance.

DPE did not have any breaches during 2018.

DPE has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release or disclosure of call detail records in calendar year 2018.

Due of the nature of its business, DPE does not believe that pretexters would attempt to gain access to the call detail records that it obtains from the provision of prepaid calling card service, because the call details are not tied to presubscribed customers. Accordingly, the Company has not developed any information with respect to the processes pretexters may use to attempt to access CPNI.