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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date filed: February 23, 2018

Name of company covered by this certification: Reinvent Telecom, LLC

Form 499 Filer ID: 828688

Name of signatory: Bill Bryant

Title of signatory: President and General Manager

I, Bill Bryant, 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 Commission's CPNI rules. *See* 47 C.F.R. § 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 (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 any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) 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.

The company represents and warrants that the above certification is consistent with 47. CFR § 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.

Signed: _____
Bill Bryant
President/General Manager

Attachments: Accompanying Statement explaining CPNI procedures

CPNI PROCESS STATEMENT 2017

Reinvent Telecom, LLC (Reinvent) has established operating procedures that ensure compliance with Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Reinvent has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

- Reinvent educates and trains its employees regarding the appropriate use of CPNI. Reinvent has established disciplinary procedures should an employee violate the CPNI procedures established by Reinvent.

- Reinvent maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Reinvent 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.

- Reinvent has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of its compliance for a minimum period of one year. Specifically, Reinvent'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.

- Reinvent took the following actions against data brokers in 2017, including proceedings instituted or petitions filed by Reinvent at a state commission, in the court system, or at the Federal Communications Commission: there were no data broker incidents in 2017.

- Reinvent used a variety of methods to authenticate customers prior to disclosing CPNI and established passwords for use when discussing Call Detail Records with the customer of record. Reinvent does not use CPNI for marketing purposes.

- The following is a summary of all customer complaints received in 2017 regarding the unauthorized release of CPNI:

  __0__ Number of customer complaints Reinvent received in 2017 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI.

  Category of complaint:

  __0__ Number of instances of improper access by employees.

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   0   Number o f 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.

Description of instances of improper access or disclosure: