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February 26, 2019  
Via ECFS Filing

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

**RE: Universal Connectivity, 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 Universal Connectivity, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to [cwrightman@inteserra.com](mailto:cwrightman@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/Connie Wightman

Connie Wightman  
Consultant

tms: FCx1901

Enclosures  
TF/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification

Covering calendar year 2018

**Name of company(s) covered by this certification:**

**Universal Connectivity, Inc.**

**Form 499 Filer ID:**

**823534**

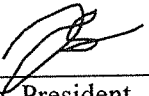
**Name of signatory:**

**James Smith**

**Title of signatory:**

**President**

1. I, James Smith, 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.*
2. 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 §64.2001 *et seq.* of the Commission's rules.
3. 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 data brokers) against data brokers in the past year.
4. The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The Company represents 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.

  
\_\_\_\_\_  
James Smith, President  
Universal Connectivity, Inc.

2-25-2019

\_\_\_\_\_  
Date

**Attachments:**      Accompanying Statement explaining CPNI procedures

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE  
EB DOCKET 06-36**

Universal Connectivity, Inc.

Statement of CPNI Procedures and Compliance

Universal Connectivity, Inc. ("Company" or "UCI") provides traditional and VOIP telecommunications and internet access services to a small number of business customers. The company does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. UCI has trained its personnel not to use CPNI for marketing purposes. Should UCI elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

UCI Customer Service personnel do not release CPNI or call detail information to incoming callers. UCI will only release CPNI or call detail information after receiving both written and verbal consent from the authorized Customer Contact and will release information only to the authorized Customer Contact for each account.

UCI does not provide on-line access to customers and therefore does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical or account information and customer notification of account changes. Information regarding customer privacy is posted on the company's website.

UCI does not have retail locations and therefore does not allow in-store access to CPNI.

UCI training procedures and a corresponding disciplinary process ensures that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI.

Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.