

**Annual 47 CFR § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date Filed: February 27, 2019
2. Name of company(s) covered by this certification:

Fidelity Telephone Co.  
Fidelity Communications Services I, Inc.  
Fidelity Communications Services II, Inc.  
Fidelity Communications Services III, Inc.  
Fidelity Networks, Inc.  
Fidelity Long Distance, Inc.  
Fidelity Systems Plus, Inc.  
Fidelity Cablevision, Inc.  
CoBridge Communications, LLC  
CoBridge Broadband, LLC  
CoBridge Telecom, LLC  
FidelityLink, LLC

3. Form 499 Filer ID(s): 802074, 820922, 822856, 827644, 820564, 819186, 816312, 827412, 828427, 828428, 828429, 829826
4. Name of signatory: Carla Cooper
5. Title of signatory: VP of Finance
6. Certification:

I, Carla Cooper, 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 CFR § 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, safeguards, 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 data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals

not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

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  [Signature of an officer, as agent of the carrier]

Attachment: 2018 Fidelity Accompanying Statement explaining CPNI Procedures

# **Statement of Compliance with the FCC's Customer Proprietary Network Information "CPNI" Rules and Regulations**

**Name of company covered by this certification:** Fidelity Communications, Co. (parent company) and its subsidiaries

**Form 499 Filer IDs:**

Fidelity Telephone Co. – 802074  
Fidelity Communications Services I, Inc. – 820922  
Fidelity Communications Services II, Inc. – 822856  
Fidelity Communications Services III, Inc. - 827644  
Fidelity Networks Inc. - 820564  
Fidelity Long Distance Inc. – 819186  
Fidelity Systems Plus, Inc. – 816312  
Fidelity Cablevision, Inc. – 827412  
CoBridge Communications, LLC – 828427  
CoBridge Broadband, LLC – 828428  
CoBridge Telecom, LLC – 828429  
FidelityLink, LLC - 829826

Fidelity Communications Co. and subsidiaries' ("Fidelity") operating procedures certify that Fidelity is in compliance with the FCC's rules and regulations regarding Customer Proprietary Network Information (CPNI).

All of Fidelity's employees are aware that disclosure of our customers' CPNI information without obtaining the proper customer approval is a violation of the FCC's rules set forth in 47 U.S.C. 222 and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. 64.2001 through 64.2009. Fidelity has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

Fidelity has taken the steps and has internal procedures in place so as to educate our employees through training regarding the FCC's rules and regulations as to when and where CPNI information may be released. The employees that have access to this information are aware that the FCC prohibits the disclosure of such information without the proper customer consent and as allowed by law and the FCC's rules.

Fidelity maintains a record of all sales and marketing campaigns and reviews any proposed outbound marketing requests

Any employee that violates Fidelity's CPNI operating procedures is subject to disciplinary action, up to dismissal.

Fidelity mandates yearly CPNI training for all employees to ensure up to date compliance with any new regulations.

Fidelity has implemented safeguards for our customers' protection against pretexters consistent with the FCC's requirements in Section 47 C.F.R. 64.2010.

Fidelity will provide written notice within five business days to the Commission of any instance where the opt-out mechanism did not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.