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February 27, 2019
Via ECFS Filing

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

RE: Public Communications Services, Inc.
Annual CPNI Compliance
EB Docket No. 06-36; 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 Public Communications Services, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon R Warren

Sharon R. Warren
Consultant

cc: Brian Hackett (Via Email) - PCS
tms: FCx1901

Enclosures
SW/sw

EB Docket 06-36

2/26/2019
Date

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

EB DOCKET 06-36

Public Communications Services, Inc.
Statement of CPNI Procedures and Compliance (for Calendar Year 2018)

Public Communications Services, Inc. ("PCS") operates solely as a provider of inmate operator services and as such provides only automated operator assisted call completion services, on a pre and post-paid basis, to inmates of local, state and federal confinement institutions. PCS provides service via contractual arrangements resulting from responses to public bids from confinement institutions.

PCS does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If the Company elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The Company does not bill customers directly. Instead, the Company provides rated call records to billing companies and billed calls appear on the customer's local exchange company bill or are debited from a prepaid account. To the extent that the billing companies act as agents for the Company and provide call detail information to customers over the telephone, such disclosure would most likely fall within the exemption for customer service/billing disputes since the customer would be able to provide all of the call detail information necessary to address the customer service issue.

If a customer is not able to provide the call detail information to qualify for the exception the Company has been advised by its billing companies that the billing companies will either call the customer back at the telephone number of record, mail the information to the customer's address of record or request the customer call back with the call detail before providing further assistance.

In lieu of contacting the Company's billing companies, Customers may contact PCS directly to review or discuss the PCS portion of the LEC bill or the prepaid account. All of the PCS Customer Care Representatives are trained on how and when they are allowed to release call detail information. Representatives are informed that unless the customer can provide the call detail necessary to address their customer service issue, they are not to release call detail information, without first authenticating the customer via a pre-established PIN or calling back to the account phone number on record under any circumstance. This callback can be made by a live customer care representative or by PCS' automated authentication and PIN set-up system. The customer then provides PCS with a 4-digit numeric PIN of their choosing. PCS instructs the customer that to maximize security, they may not choose a PIN based upon easily obtained biographical or account information. PCS informs customers, after the PIN set-up is complete, that this PIN needs to be provided by the customer before they are allowed to obtain access to any CPNI data via the live Customer Care Department or the

Automated Pay-by-Phone channel. If a customer is unable to provide the correct PIN the customer must be re-authenticated via the process outlined above.

There is an annual refresher training for all PCS Customer Service Representatives. Training includes information on CPNI and on protective measures – specifically not to release any CPNI data over the phone without first authenticating the customer, either via a previously established PIN or the call back method. The PCS Customer Care computer application maintains a log of all actions taken by a Customer Care Representative when handling a specific call. Whether the caller provided their correct PIN, whether a call back authentication was necessary, whether the caller was setting up a brand new account and set up a new PIN, is all captured in this log. All calls are also subject to monitoring by the Customer Care Department supervisors.

In addition to the Customer Care Representatives, all PCS employees who have access to CPNI are trained annually on the importance of protecting customer data and security. Training includes information on and policies on when and how CPNI data can be release as well as internal procedures for violations of CPNI release.

All PCS employees are required to sign a Confidentiality Agreement upon hire, which explicitly states that they are not allowed to divulge any proprietary customer data which they may encounter performing their job, including CPNI, during or after their tenure with PCS. There is a documented company policy guide that outlines the disciplinary procedures should an employee breach this agreement. Resulting disciplinary actions due to breach of the Confidentiality Agreement are handled on a case by case basis, based on the severity of the breach, up to and including immediate termination.

The Company's website includes a secure log-in, using their pre-established PIN, for customers. Customers may set up, fund, review balance information and request refunds for prepaid accounts. The web portal also gives customers access to their prepaid call and payment history. In addition, for certain accounts, customers are able to send funds to a specific inmate's debit account. These funds are considered a "gift" to the inmate and the customer funding this gift is not able to view the inmate's balance information, call detail information or request a refund.

The Company does not have any retail locations and therefore does not disclose CPNI at in-store locations.

Requests for call detail records by law enforcement agencies are only granted if a subpoena is provided.

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

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

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call records.