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February 28, 2018  
**Via ECFS Filing**

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

**RE: Certain Communications Corporation 499 Filer ID 827555**  
**CY 2017 Annual CPNI Certification**  
**EB Docket No. 06-36**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2017 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 Certain Communications Corporation.

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

Sincerely,

/s/ Connie Wightman

Connie Wightman  
Consultant

cc: Todd Steiner – Certain (via Email)  
tms: FCx1801

CW/sp

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 for Calendar Year: 2017

Name of company covered by this certification: Certain Communications

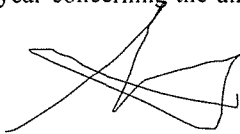
Corporation Form 499 Filer ID: 827555

Name of signatory: Todd Steiner

Title of signatory: Chief Financial Officer

I, Todd Steiner, certify and state that:

1. I am the Chief Financial Officer of Certain Communications Corporation ("Certain") and, acting as an agent of the company, I have personal knowledge of Certain's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Certain's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.
4. 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. Additionally, the Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



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Todd Steiner  
Chief Financial Officer

2/25/18

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Date

Exhibit A  
Statement of CPNI Procedures and Compliance

## **CERTAIN COMMUNICATIONS CORPORATION**

### **STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

Certain Communications Corporation's ("Certain") main business focus is the provisioning of Interexchange Toll Services on a wholesale basis. Therefore, the company is not providing any services where they are involved in the collection or billing of CPNI type information but only act as a traffic conduit for end-user service providers

Certain does not use or permit access to CPNI to market any telecommunications or non-- telecommunications services. Notwithstanding the services that the company offers, Certain has trained its personnel not to use CPNI for marketing purposes. Should Certain 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.

Certain has instituted training procedures and a corresponding disciplinary process to ensure 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.

Although Certain never has had an instance where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI , it still has procedures in place to track these instances , and notify the appropriate agencies, should they occur. Certain has processes in place to safeguard the call detail information 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 detail is stored in a database that is protected; only authorized Certain personnel have access to the database. It is not accessible by anyone outside the company.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commission s, the court system, or at the Commission) against data brokers in the past year. Additionally, the Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.