

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

EB Docket 06-36

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

Date filed: February 28, 2019

Name of companies covered by this certification:

LP Telecom LLC

832441

Name of signatory: Omar Luna

Title of signatory: CTO

I, Omar Luna, 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, consisting of the CPNI Compliance Policies and Operating Procedures of LP Telecom LLC that describes the steps taken to protect CPNI and explains how the companies' procedures ensure that they are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions 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.

Signed



Omar Luna

CTO

LP Telecom LLC

Attachments: Accompanying statement explaining CPNI procedures.

LP Telecom LLC

STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION

Set forth below is a statement summarizing the policies and procedures of LP Telecom LLC ("LP Telecom") which ensure adequate compliance with the Federal Communications Commission's ("FCC") CPNI regulations. See 47 C.F.R. § 64.200l et seq. LP Telecom provides telecommunications services exclusively as a private service provider and wholesale supplier to the prepaid calling services industry.

As a wholesale prepaid services provider, the company does not have access to CPNI. Prepaid services customers do not "subscribe" to the services of LP Telecom in the same manner as customers of non-prepaid service providers; rather, these customers decide for themselves if they will use the company's services. These customers do not receive bills from LP Telecom. LP Telecom does not have information concerning the quantity, technical configuration, type, destination, location, or amount of use of telecommunications services which can be associated with any individual customer. Indeed, because the company's prepaid services may lawfully be utilized by any authorized user of the purchased services, LP Telecom has no means of identifying the particular individual which has placed any particular call.

Nevertheless, LP Telecom has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI and, furthermore, the company has informed its employees of the company's CPNI compliance policy. LP Telecom does not release or distribute CPNI to unauthorized individuals; neither does LP Telecom use CPNI in violation of § 64.200 § et seq. of the FCC's Rules.

To the extent Call Detail Records ("CDRs") exist, they are not associated with any individually identifiable customer and do not constitute CPNI. To the extent that such CDR information exists in paper, removable magnetic or optical form, it is maintained by LP Telecom in a secure location which is not accessible by employees of LP Telecom without going through the company's established security procedures. When such information is maintained on a computer, the computer and/or the individual file is password protected.

As noted above, LP Telecom does not maintain CPNI in any manner which would give rise to the unauthorized disclosure of confidential information. Even in cases dealing with the limited information which is necessary to facilitate customer purchases of prepaid telecommunications services, LP Telecom takes steps prior to providing any requested information to assure itself that the individual making the request is authorized to obtain it.

Moreover, any call detail information obtained by LP Telecom is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes. In the event of unauthorized CPNI access, LP Telecom will notify the requisite law enforcement agencies, and the customer when possible.

LP Telecom did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because LP Telecom does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through LP Telecom, it cannot notify those end-user customers directly if a breach occurs. However, LP Telecom has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than publicly reported information regarding the processes that pretexters or data brokers are using to attempt to access CPNI.