



• **U.S. Steel Tower**
600 Grant Street, 30th Floor
Pittsburgh, PA 15219

February 28, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W. Suite TW-A325
Washington, DC 20554

**Re: Full Service Network LP
Filer ID 828258
Annual CPNI Compliance Certification - CY 2018 EB
Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Full Service Network LP (the "Company"), and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Company's calendar year 2018 CPNI Certification.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Ch. Honeywill, EVP".

Christopher C. Honeywill
Executive Vice President
Full Service Network

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018.

Date filed: February 28, 2019

NAME OF COMPANY COVERED BY THIS CERTIFICATION: FULL SERVICE NETWORK LP

Form 499 Filer ID: 828258

Name of signatory: Christopher Honeywill

Title of signatory: EVP

I, Christopher Honeywill, 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 as to the telecommunications services provided by the Company that are regulated by the Commission. See 47 C.F.R. § 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 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 nor have any pretexters attempted to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

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 be subject to enforcement action.

Signed

Ch. Honeywill, EVP

Statement of Christopher C Honeywill, EVP of Full Service Network LP ("Company")

This is to certify:

- 1.) The Company has not and will not engage in the practice of selling, lending, or licensing any CPNI to a third-party vendor for any purpose.
- 2.) Customer data is housed in secure databases that are constantly monitored.
- 3.) There are no third-party contractors accessing our databases.
- 4.) The Company does not permit the use of CPNI for any marketing purposes whatsoever, and therefore does not collect opt-in or opt-out authorizations from customers for such use. The Company does not conduct sales and marketing campaigns that use customers' CPNI. The Company does not share, sell, lease or otherwise provide CPNI to any third party for the purposes of marketing any services. Records of all other contacts with the customer (written or oral) are maintained in customer's account records for at least two years.
- 5.) The Company has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, the Company will notify affected customers. The Company will maintain a record of any CPNI-related breaches for a period of at least two years.
- 6.) New employees undergo a security check before beginning employment with the Company and are required to execute a confidentiality agreement which restricts disclosure of customer information.
- 7.) As a condition of employment Employees must adhere to the following CPNI policy contained in the Corporate Policy:

1340 - Customer Information and CPNI

All customer and prospect telephone records (called "CPNI") are Confidential, protected by law, and governed by a non-disclosure agreement executed as a condition of your employment.

- CPNI includes customer and prospect names, phone numbers, calls made, billing records, and customer network setup info, etc.
- CPNI is not for Employee disclosure outside the Company except when Employee is communicating with the Customer or Customer's agent in which case the disclosure is authorized.
- There can be no removal of any document or file containing CPNI including without limitation, **commission sheets, completed applications, documents, notes, files, records, or computer files**, containing customer information without permission from President.
- Employees must not disclose any CPNI purposefully or inadvertently (through casual conversation), to any unauthorized person outside the Company.
- Employees who are unsure about the confidential nature of specific information have the burden to ask their Supervisor for clarification.
- Employees will be subject to appropriate disciplinary action, up to and including dismissal, for knowingly or unknowingly revealing information of this nature to an unauthorized party or for transporting this information outside the Company without approval.

8.) Periodic audits insure employee compliance with the policy. Disciplinary measures are invoked including dismissal, when employees are discovered as not following the policy.

Signed

Ch. Honeywill, EVP

Date 02-28-2019