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March 1, 2019
Via ECFS Filing

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

RE: Total Technologies, LLC
EB Docket No. 06-36; CPNI Certification 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 Total Technologies, LLC.

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

Sincerely,

/s/Connie Wightman

Connie Wightman
Consultant

tms: FCx1901

Enclosures
CW/im

**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

Covering calendar year 2018

Name of company(s) covered by this certification:

Total Technologies, LLC

Form 499 Filer ID:

830270

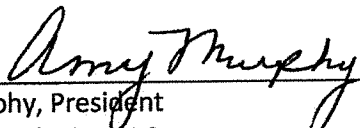
Name of signatory:

Amy Murphy

Title of signatory:

President

1. I, Amy Murphy, 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.*
2. 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, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. 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.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §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.



Amy Murphy, President
Total Technologies, LLC

3/1/19

Date

Attachments: Accompanying Statement explaining CPNI procedures for Total Technologies, LLC

**ACCOMPANYING STATEMENT EXPLAINING CPNI PROCEDURES, EXPLANATION
OF ACTIONS TAKEN AGAINST DATA BROKERS, AND
AND SUMMARY OF CUSTOMER COMPLAINTS**

This statement accompanies the Company's Customer Proprietary Network Information ("CPNI") Certification for the year ended **December 31, 2018**, as required by Section 64.2009 (e) of the Federal Communications Commission's ("FCC") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with part 64, Subpart U of the FCC's rules. See 47 C.F.R. 64.2001 *et seq.* The below procedures are specifically designed to comply with the Commission's CPNI rules and regulations, as well as to maintain the security of the CPNI of the Company's customers.

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

Accompanying Statement Explaining CPNI Procedures

1. CPNI Operating Procedures

Changes to Account Information

Pursuant to Section 64.2010 (f), when a customer's account information or password has been modified, the Company immediately sends a text notification to the customer's phone number notifying him or her that a change has been made to the account, and that the customer should call customer service with any questions. If such customer is unable to receive a text message or, if the Company receives a reply that the message could not be delivered, the Company mails a letter to the customer's address of record.

Customer Initiated Calls

Customer service representatives are trained that in order to discuss call details or other CPNI during a customer initiated phone call, customers must first be properly authenticated by proving a password meeting the requirements of Section 64.2010 (b). In the event a customer forgets his/her password, the Company has implemented password back-up authentication procedures in compliance with Section 64.2010 (e).

2. Training Procedures

The Company has established procedures to train employees having access to, or occasion to use customer data. Employees are trained to identify CPNI, consistent with the definition of CPNI under Section 64.2003 (g) and Section 222 (F) (1) of the Communications Act of 1934 as amended (47 U.S.C. 222 (f) (1)). Likewise, employees are trained on safeguards to protect CPNI and as to when they are and are not authorized to use CPNI. Training occurs at the time of hire and again as required.

In addition, the IT department periodically updates the Company's CPNI Protection Policy, which every employee must read and sign. All employees have access to CPNI resources and guidelines in the event they have additional questions about CPNI and CPNI related issues.

3. Supervisory Review

At this time, the Company does not use CPNI for outbound marketing purposes that requires either opt-out or opt-in consent. Before taking to use CPNI for outbound marketing purposes that require such consent, the Company will establish review procedures to ensure compliance with Section 64.2009 (d).

4. Customer Notification and Authorization Process

The Company does not currently use CPNI for marketing purposes that require either opt-out or opt-in consent in accordance with the Commission's rules. Prior to initiation of any program for the use of CPNI for marketing purposes, except as allowed under the Commission's rules, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

5. Recordkeeping of Use of CPNI

As mentioned above, the Company currently does not utilize an opt-out or opt-in consent process. At such time as the Company may initiate use of CPNI for marketing, the Company will develop and utilize a system for maintaining readily accessible records.

6. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of or access to CPNI. Employees are notified that any infraction involving CPNI will result in disciplinary action up to and including termination of employment.

7. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related record keeping and deferred notification to customers. If an incident or customer complaint appears to involve CPNI, a designated CPNI manager within the Company is notified. The CPNI manager will analyze the situation, maintain a detailed report and inform law enforcement if necessary pursuant to 64.2011. The manager also maintains records of incidents pursuant to Section 64.2011 (d).

Actions Taken Against Data Brokers and Responses to Customer Complaints.

No actions were taken against data brokers in 2018.

Summary of Customer Complaints

The Company received no customer complaints concerning the unauthorized release of CPNI in 2018.