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March 1, 2018  
Via ECFS Filing

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

**RE: Lattice Incorporated – 499 Filer ID 828040**  
**CY 2017 CPNI**  
**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 Lattice Incorporated.

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](mailto:swarren@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon R. Warren

Sharon R. Warren  
Consultant

cc: Terry Whiteside – Lattice (via Email)  
tms: FCx1801

Enclosures  
SW/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 2018:	Covering calendar year 2017
Name of company(s) covered by this certification:	Lattice Incorporated
Form 499 Filer ID:	828040
Name of signatory:	Paul Burgess
Title of signatory:	CEO

1. I, Paul Burgess, 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 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.

  
\_\_\_\_\_  
Paul Burgess, CEO  
Lattice Incorporated

February 26, 2018  
\_\_\_\_\_  
Date

**Statement of CPNI Procedures and Compliance  
For 2017  
Lattice Incorporated**

Lattice Incorporated operates solely as an institutional services provider and as such provides only operator assisted call completion services for transient end users. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship, and we do not obtain or retain any CPNI that could be used for marketing purposes.

Our marketing efforts are directed only towards correctional facilities, and such efforts do not include the use of CPNI. Should we expand our business in the future to include the provision of services that involve CPNI, we 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, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

We prohibit employees from releasing call detail information during customer-initiated telephone contact. Requests for call detail on prepaid accounts are mailed to the address of record. Prior to mailing, a call is placed to the customer of record phone number on file to verify the request. All customer service personnel are trained not to discuss call detail information unless calling party can identify the call detail related to their inquiry.

Processes are in place to safeguard 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. Each new employee is trained on rules and operating procedures governing consumer inquiries and must sign a statement that they have reviewed rules and operating procedures governing consumer inquiries. In addition, all employees must sign a statement annually stating that they have reviewed rules and operating procedures governing consumer inquiries. Annual meetings with customer service call center employees are conducted to go over the rules and operating procedures governing consumer inquiries.

We do not disclose call detail on line to end users under any circumstances. Call detail is always required to be made available to correctional facility management personnel, who control their own access to it.

As an institutional services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We do not initiate changes to any prepaid account. In the event that an account holder notifies us of a change in information associated with the account, a call is placed to the phone number on file notifying the account holder that there has been a change. If the customer does not have voicemail, notification of an account change is mailed to the address of record. In either circumstance, the nature of the change is not revealed.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records. We have not had any such breaches during 2017, but we have a process in place to maintain records of any breaches discovered and notifications made to the US Secret Service and the FBI.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2017.

We have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.