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Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: EB Docket No. 06-36

Dear Ms. Dortch:

As required by Section 64.2009(e) of the FCC's Rules, this provides the Annual CPNI Certification for calendar year **2017** for Aristotle Unified Communications L.L.C. d/b/a Aristotle Digital Voice.

1. Date filed: **March 1, 2018**
2. Name of company(s) covered by this certification: **Aristotle Unified Communications L.L.C.**
3. Form 499 Filer ID: **831108**
4. Name of signatory: **L. Elizabeth Bowles**
5. Title of signatory: **President**
6. Certification


I, **L. Elizabeth Bowles**, 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 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, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

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.

The company **has not** received 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 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.

Signed 

Attachment: Accompanying Statement explaining CPNI procedures

CPNI Procedures

Aristotle Unified Communications ("Aristotle" or "company") has procedures for managing client CPNI information as follows:

1. Aristotle's Privacy Policy clearly states our practices for managing our customers' CPNI and is located in the contract and on our website. Our company's systems for storing CPNI are subject to password protection and other authentication procedures. This policy states that Aristotle does not use or sell CPNI for marketing or any other reasons. The only time Aristotle will provide CPNI is when subpoenaed by a court of law or subject to other legal process.
2. During the customer contracting process, Aristotle gives the client the ability to opt out from any emails, both marketing and service related. Emails to customers include an opt-out option at the bottom of the email. Also, the customer can reply to the email and asked to be removed from the subscription list. Aristotle will provide notice the FCC within five (5) days if the opt-out mechanism is not working properly where the inability of a customer to opt out is more than an anomaly.
3. General client CPNI information will not be provided via telephone. Customers must log into their portals to get the desired information.
4. Troubleshooting calls will be authenticated by a user-generated PIN. The PIN is provided to Aristotle by the customer during installation process.
5. Aristotle conducts employee training on how to handle CPNI on an annual basis and whenever an employee (new or existing) gains access to our customers' CPNI. Our company has established operating procedures whereby personnel who are authorized to access CPNI are trained in the authorized uses of this information. All employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by our company. Pursuant to these procedures, any employee who violates the authorized procedures for access to this information is subject to discipline, up to and including termination of employment.
6. Aristotle may, as permitted by the CPNI rules, use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of Aristotle, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.
7. Aristotle will maintain records of its and its affiliates' sales and marketing campaigns that use our customers' CPNI. Such records include all instances where CPNI was disclosed and a description of those services and products that were offered as part of the campaign. Aristotle maintains these records for a minimum of one (1) year.

Actions against Data brokers

Aristotle did not take any actions against data brokers in 2017.

Summary of Customer Complaints

Aristotle did not receive any customer complaints in 2017.