



151 Southhall Lane, Ste 450  
Maitland, FL 32751  
P.O. Drawer 200  
Winter Park, FL 32790-0200  
[www.inteserra.com](http://www.inteserra.com)

March 5, 2019  
**Via ECFS Filing**

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

RE: Legacy Long Distance International, Inc.  
EB Docket No. 06-36; CY2018 Annual CPNI Certification

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 Legacy Long Distance International, Inc.

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: Rafael Quinto (Via Email) - Legacy  
tms: FCx1901

SW/mp

**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 Calendar Year: 2018

Name of company covered by this certification: Legacy Long Distance International, Inc.

Form 499 Filer ID: 817998

Name of signatory: Brian Hill

Title of signatory: CEO

I, Brian Hill, certify and state that:

1. I am the CEO of Legacy Long Distance International, Inc. ("Legacy") and, acting as an agent of the company, I have personal knowledge of Legacy's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Legacy's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A 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.
4. The Company has not taken any actions (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. Additionally, the Company has not received any 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.

  
\_\_\_\_\_  
Brian Hill  
CEO

2/28/19  
\_\_\_\_\_  
Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

## **Legacy Long Distance International, Inc.**

### **STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

Legacy Long Distance International, Inc. ("Legacy") operates as an operator service and competitive local exchange provider with the majority of the company's services focused on operator assisted call completion services for transient end users and for incarcerated persons in correctional facilities. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship, and Legacy does not obtain or retain any CPNI that could be used for marketing purposes. Legacy does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Legacy has trained its personnel not to use CPNI for marketing purposes. Should Legacy elect to use CPNI in future marketing efforts, it 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.

Legacy has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

Although Legacy never has had an instance where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI, it still has procedures in place to track these instances, and notify the appropriate agencies, should they occur. Legacy has processes in place to safeguard the 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. All call detail is stored in a database that is protected; only authorized Legacy personnel have access to the database. It is not accessible by anyone outside the company.

When a customer calls to discuss their account, requesting access to CPNI, the company requires verification of at least three (3) identifying pieces of information to ensure the company is discussing the account with an authorized individual.