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March 11, 2019
Via ECFS Filing

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

RE: Eze Castle Integration, Inc.
EB Docket No. 06-36; CY2018

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 Eze Castle Integration, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to nfernandez@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Nelson Fernandez

Nelson Fernandez
Consultant

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 2019:	Covering calendar year 2018
Name of company(s) covered by this certification:	Eze Castle Integration, Inc.
Form 499 Filer ID:	830162
Name of signatory:	John Cahaly
Title of signatory:	CEO

1. I, John Cahaly, 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.

John Cahaly, CEO
Eze Castle Integration, Inc.

3/1/19

Date

Attachment A
Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance

Eze Castle Integration, Inc. ("ECI" or "Company") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Eze Castle Integration, Inc. has trained its personnel not to use CPNI for marketing purposes. Should Eze Castle Integration, Inc. 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.

ECI has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.
ECI serves only business customers. We have dedicated account managers for each customer. If CPNI protected data is requested it would be done through the account manager by a known, client-authorized party. The account manager must then request the information from product management staff who will remind the account manager of ECI's policies regarding CPNI data when providing the requested information. The account manager will then fulfill the customer's request via a known, client-authorized form of communication (email, postal mail) associated to the client's account records. For 3rd party partners who are engaged in some part of the delivery of the service, ECI prohibits the use of CPNI for any purpose other than rendering the services subscribed by ECI and/or the customer. ECI will not disclose CPNI protected data to 3rd parties who are not engaged in the delivery of the service.

ECI does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

ECI does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

ECI does not have any retail locations and therefore does not disclose CPNI in-store.

The company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

ECI maintains records of all breaches discovered and notifications made to the USSS and the FBI, and to customers .

Company has not taken any actions against data brokers in the last year.

Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2018.

With respect to pretext methods, the most common pretext methods we anticipate would be falsified email requests or telephone pretext requests. Account managers are instructed NOT to reply to email requests for information, NOR share any information over the telephone. The account manager would provide the information via communication to party(s) of record via the address(es) of record from our account management system.