Law Offices of Bennet & Bennet, PLLC

Maryland
6124 MacArthur Boulevard
Bethesda, Maryland 20816
Tel: (202) 371-1500
Fax: (202) 371-1558
www.bennetlaw.com

District of Columbia
5185 MacArthur Boulevard, NW, Suite 729
Washington, DC 20016

Caressa D. Bennet
Michael R. Bennet
Marjorie G. Spivak*
Kenneth C. Johnson‡
Howard S. Shapiro

Daryl A. Zakov⅄
Robert A. Silverman
Anthony K. Veach#
Erin P. Fitzgerald
Of Counsel
Tara B. Shostek

** Admitted in DC & PA Only*
‡Admitted in DC & VA Only
⅄Admitted in DC & WA Only
#Admitted in DC & FL Only

January 6, 2015

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W., Suite TW-A325
Washington, DC 20554

Re: CPNI Certification and Accompanying Statement
EB Docket No. 06-36

Dear Ms. Dortch:

Totelcom Communications, LLC ("the Company"), by its attorneys and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its annual Customer Proprietary Network Information (CPNI) certification and accompanying statement.

Should you have any questions or need further information, please contact the undersigned.

Sincerely,

/s/

Marjorie Spivak

cc: Best Copy and Printing, Inc.

Attachments

4837-8674-7910, v. 2

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014

Date filed: 01/06/2015

Name of company(s) covered by this certification: Totelcom Communications, LLC

Form 499 Filer ID: 801417

Name of signatory: Toney Prather

Title of signatory: President

I, Toney Prather, 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, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any 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 any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

The company represents and warrants that the above certification is consistent with 47.C.F.R. § 1.17 which represents 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 _____

STATEMENT OF COMPLIANCE WITH THE FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES

To the best of my knowledge, Totelcom Communications, LLC ("the Company") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Company's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

The Company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

The Company has not taken any actions against data brokers in the past year concerning the unauthorized release of CPNI. The Company has received zero (0) customer complaints relating to the unauthorized access to CPNI, or unauthorized disclosure of CPNI. The Company realizes the industry-wide pretexting problem, and has implemented several safeguard procedures to protect its customers CPNI such as password protection and authorized user lists, to name a few.

Company CPNI Status: To the best of my knowledge and belief, the Company does not presently use, sell, or otherwise release CPNI for marketing or other commercial purposes. If our customers' CPNI is to be used for sales and marketing campaigns in the future, the appropriate safeguards will be implemented in accordance with 47 C.F.R. §64.2009.