



February 13, 2015  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

**RE: EB Docket No. 06-36 CY 2014  
2013 CPNI Certification Filing for The Contact Network, Inc.  
Form 499 Filer ID 822576**

Dear Ms. Dortch:

Enclosed for filing please find

Attached for filing is the Calendar Year 2014 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 the Contact Network, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to [cwightman@tminc.com](mailto:cwightman@tminc.com).

Thank you for your assistance in this matter.

Sincerely,

/s/Connie Wightman

Consultant

cc: Lisa Maddox - Contact Network, LLC (email)  
file: Contact Network, LLC - FCC  
tms: FCCx1501

Enclosures  
CW/lw

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 2015:                      Covering calendar year 2014  
Name of company(s) covered by this certification:                The Contact Network, Inc.  
Form 499 Filer ID:    822576  
Name of signatory:   Martin Costa  
Title of signatory:   President

1. I, Martin Costa, 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) 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.



\_\_\_\_\_  
Martin Costa, President  
The Contact Network, Inc.

Date: \_\_\_\_\_

**Attachments:**        Accompanying Statement explaining CPNI procedures  
                              Explanation of actions taken against data brokers (not applicable, see  
                              Statement)  
                              Summary of customer complaints (not applicable, See Statement)

**Attachment A**

**Statement of CPNI Procedures and Compliance  
For The Contact Network, Inc.**

## **Statement of CPNI Procedures and Compliance For The Contact Network, Inc.**

### **USE OF CPNI**

The Contact Network, Inc. does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. The Contact Network, Inc. has trained its personnel not to use CPNI for marketing purposes. Should The Contact Network, 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.

The Contact Network, Inc. does have CPNI, including call detail information concerning the calls made using the Company's services. However, this information is not made available to customers over the telephone or in person. Online access to account information is protected as described below.

### **PROTECTION OF CPNI**

As set forth below, The Contact Network, Inc. has put into place processes to safeguard its customers' CPNI (including 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 customer CPNI. Requests for information must be sent in writing by the authorized party of record for the customer. The Contact Network, Inc. responds back in writing, to the authorized customer representative at the primary address of record. The company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to insure that procedures are being followed.

### **DISCLOSURE OF CALL DETAIL OVER PHONE**

The Contact Network, Inc. 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.

### **DISCLOSURE OF CPNI ONLINE**

The Contact Network, Inc. has instituted authentication procedures to safeguard the disclosure of CPNI online. The Contact Network, Inc.'s authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. The Contact Network, Inc. authenticates customers by establishing a password with a security question for online access to the account. All customers are required to establish a password without the use of readily available biographical information or account information if they want to have on-line access to their CNPI. Unless the appropriate password is provided, The Contact Network, Inc. does not allow on-line access to CPNI.

**DISCLOSURE OF CPNI ONLINE, (Cont'd.)**

The Contact Network, Inc. has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. Company's back-up authentication procedure operates as follows: If there is a change, an email is sent to the authorized representative of record who initially established the password. If the security question cannot be answered correctly, a The Contact Network, Inc. representative will call back the authorized representative of record at the address of record to reset the password.

The Contact Network, Inc. has put into place procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information. If the customer calls The Contact Network, Inc. due to a problem with the online access, The Contact Network, Inc. will call back the contact at the address of record to resolve the issue.

**DISCLOSURE OF CPNI AT RETAIL LOCATIONS**

The Contact Network, Inc. does not have any retail locations and therefore does not disclose CPNI in-store.

**NOTIFICATION TO LAW ENFORCEMENT**

The Contact Network, Inc. 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.

The Contact Network, Inc. maintains Electronic records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

**ACTIONS AGAINST DATA BROKERS**

The Contact Network, Inc. has not taken any actions against data brokers in the last year.

**CUSTOMER COMPLAINTS ABOUT CPNI BREACHES**

The Contact Network, Inc. did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2014.

**INFORMATION ABOUT PRETEXTERS**

The Contact Network, Inc. has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI by adhering to the guidelines described herein for access to CPNI. The Contact Network, Inc. is committed to notify the FCC of any new or novel methods of pretexting that it encounters and of any actions The Contact Network, Inc. takes against pretexters and data brokers.