



February 18, 2015
Via ECFS Filing

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

**RE: 1stPoint Communications, LLC
EB Docket No. 06-36; CY2014**

Dear Ms. Dortch:

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 1stPoint Communications, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to stthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant to 1stPoint Communications, LLC

cc: Erik B. Levitt, 1st Point
file: 1st Point - FCC - Other
tms: FCx1501

Enclosures
ST/im

Attachment A
Statement of CPNI Procedures and Compliance

1stPoint Communications, LLC

Statement of CPNI Procedures and Compliance

1stPoint Communications, LLC (“1stPoint” or “the Company”) is predominantly a wholesale provider of VOIP services, with a limited number of retail VOIP customers. The Company does not use or permit access to CPNI to market any telecommunications or non-telecommunications services and has trained its personnel not to use CPNI for marketing purposes. Should 1stPoint 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.

1stPoint has 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. The data is maintained on secure servers with security authentication in place (usernames and strong passwords) behind firewalls. The Company does not disclose CPNI over the telephone or online. 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.

1stPoint has processes in place to immediately notify its retail customers whenever a change is made to the customer’s account without revealing the changed information or sending the notification to the new account information. Customer data is available only to the customer online and is not revealed in the notifications.

1stPoint does not have any retail locations and therefore does not disclose CPNI instore.

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. Although there have been no breaches to report to date, the Company has a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI, and to customers, for at least two years, consistent with FCC rules.

1stPoint has not taken any actions against data brokers in the last year.

1stPoint did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2014.

1stPoint has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.