



**Annual 64.2009(e) CPNI Certification for 2015
Covering the Prior Calendar Year 2014**

Received & Inspected

FEB 27 2015

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Date filed: February 25, 2015

Name of company covered by this certification: segTEL, Inc.

Form 499 Filer ID: 825324

Name of signatory: Kurt Van Wagenen **DOCKET FILE COPY ORIGINAL**

Title of signatory: Chief Executive Officer

Certification:

I, Kurt Van Wagenen, certify that I am an officer of segTEL, Inc. (the "Company") doing business as FirstLight Fiber ("FirstLight"), 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, recordkeeping and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken actions (*i.e.*, the Company has not instituted proceedings nor filed petitions at either a state commission, 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. 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.

**Kurt Van Wagenen
Chief Executive Officer
TVC Albany, Inc. parent company of segTEL, Inc.**

Attachments: Accompanying Statement explaining CPNI procedures

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**STATEMENT OF COMPLIANCE
WITH CPNI RULES
segTEL, Inc.**

segTEL, Inc. (the "Company") doing business as FirstLight Fiber ("FirstLight") is a facilities-based provider of advanced, integrated packages of communications services to customers in moderately-populated areas of New England. The Company provides a variety of telecommunications and information services on a wholesale basis to other telecommunications carriers and on a retail basis to enterprise customers, small business customers, and residential customers. These services include, but are not limited to, various forms of local and long distance telecommunications services, managed connectivity, hosting, private line services, collocation services, internet access and fiber to the premises. The Company continues to expand its fiber network throughout the New England states, bringing competitive and advanced telecommunications services to many under-served and rural areas.

As permitted by the CPNI rules, the Company uses CPNI, without the customer's prior approval, to (1) to initiate, provide, bill and collect for telecommunications services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) for the purpose of providing customer premises equipment and protocol conversion; and (4) in order to provision inside wiring, maintenance and repair services.

In addition, in accordance with the applicable FCC CPNI Rules, the Company provides regular written CPNI notices to all customers and uses the opt-out method of obtaining customer approval to use CPNI for marketing purposes. Specifically, the Company's opt-out CPNI notice explains the customers' CPNI rights, including their right to restrict the use and disclosure of, and access to their CPNI, and also provides information on how customers can choose to not receive marketing from the Company. The Company only uses CPNI to market communications-related services outside of those services to which a customer already subscribes if the customer has granted approval pursuant to instructions in its opt-out CPNI notices. The Company has a system by which the status of a customer's CPNI approval can be clearly established prior to the use or disclosure of that customer's CPNI. The Company maintains records of customer approval and the delivery of its CPNI notices for at least one year.

In certain limited circumstances, the Company may share CPNI with prospects in response to a request for proposal ("RFP") for telecommunications services. For instance, the Company provides telecommunications services to large institutions and government agencies who, as part of the RFP, request information about similarly-situated existing Company customers. In these instances, prior to sharing customer CPNI with any prospect, the Company contacts the existing customer and obtains its express affirmative consent to share CPNI with the prospect. The Company maintains for at least one year a record of such customer's assent. Except for the purposes described above, or when required by law, the Company does not share, sell, lease or otherwise provide CPNI to any unrelated third parties without affirmative consent from the customer.

The Company has implemented processes and procedures to train its personnel as to when they are and are not permitted to use CPNI. For instance, all Company employees are required to abide by the Company's CPNI Policy, which provides a comprehensive description of Company's CPNI policies and procedures. Employees who violate the Company's CPNI Policy will be subject to discipline, including possible termination.

From time to time, the Company uses independent contractors to perform sales functions. Even though these independent contractors do not have any access to a customer's call detail records or other CPNI after the sale is completed, the Company contractually requires each independent contractor to have protections in place to ensure the confidentiality of any information that is obtained from Company customers. These contracts further prohibit these independent contractors from using, allowing access to, or disclosing any Company customer information to any other party, unless required to make such disclosure under force of law.

The Company does not currently engage in any large-scale coordinated sales and marketing campaigns. A significant amount of the Company's marketing is focused on new customers in areas where the Company has built facilities. The Company does some limited marketing of new services to existing customers on a case-by-case basis. Records of customer contacts that utilize CPNI are maintained in Company databases for at least one year. Specifically, the Company utilizes a contact management database that tracks customer contacts made by Company sales and marketing employees and the Company utilizes an account management and trouble ticketing system that documents its contact with customers. Marketing campaigns are supervised by at least one senior executive. Records of such supervision are maintained for at least one year.

The Company has implemented procedures whereby it will not provide CPNI without proper customer authentication on inbound telephone calls. In order to authenticate a customer's identity prior to disclosing CPNI, the Company authenticates the customer using a variety of methods. When a customer initiates an inbound communication, such as email or a telephone call, segTEL will disclose CPNI, including Call Detail Information, with a customer in the context of that inbound communication only by outgoing communication to the address of record. Commercial customers have account managers.

The Company has implemented a backup method for allowing customers to change passwords in the event that passwords are lost or forgotten that conforms to the relevant FCC rules. The Company has implemented procedures to inform customers of online changes to account information in a manner that conforms with the relevant FCC rules.

The Company has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, the Company will notify affected customers and will maintain a record of any CPNI-related breaches for a period of at least two years.