SouthernLINC. Wireless
A Southern Company

February 24, 2016

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

via ECFS

Re: Annual CPNI Certificate Filing - Southern Communications Services, Inc. d/b/a SouthernLINC Wireless, EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Southern Communications Services, Inc. d/b/a SouthernLINC Wireless, enclosed is the company's annual CPNI certification for filing in the above-referenced docket.

Please contact me at (678) 443-1716 if you have any questions or concerns.

Sincerely,

Bryant Peters
External Affairs Specialist
Southern Communications Services, Inc.

SouthernLINC. Wireless

A Southern Company

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2016 covering the prior calendar year 2015

1. Date: February 24, 2016

2. Name of company covered by this certification: Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless")

3. Form 499 Filer ID: 812395

4. Name of signatory: Carmine A. Reppucci

5. Title of signatory: CFO, VP & Treasurer

6. Certification:

I, Carmine A. Reppucci, 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 (*e.g.*, proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company did not receive customer complaints in calendar year 2015 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.

Signed _____

Carmine A. Reppucci

Attachment: Accompanying Statement explaining CPNI procedures

SouthernLINC. Wireless

A Southern Company

Statement Regarding the Customer Proprietary Network Information (CPNI) Procedures of SouthernLINC Wireless

This statement explains how the procedures of Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless") ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules, 47 C.F.R. § 64.2001 *et seq.*

USE OF CPNI - SECTION 64.2005

- SouthernLINC Wireless does not use, disclose or permit access to CPNI for the purpose of marketing the products or services of itself, its affiliates or any third parties, beyond permitting SouthernLINC Wireless employees to use CPNI during telephone calls with existing customers in order to discuss rate plans and service offerings among the categories of service to which the customer already subscribes. As such, SouthernLINC Wireless does not solicit the approval of customers to use CPNI.

- SouthernLINC Wireless does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.

APPROVAL REQUIRED FOR USE OF CPNI – SECTION 64.2007

- SouthernLINC Wireless does not use, disclose or permit access to CPNI for the purpose of marketing the products or services of itself, its affiliates or any third parties (beyond permitting SouthernLINC Wireless employees to use CPNI during telephone calls with existing customers in order to discuss rate plans and service offerings among the categories of service to which the customer already subscribes), or for any purpose that would require SouthernLINC Wireless to solicit customer approval before doing so. As such, SouthernLINC Wireless does not solicit the approval of customers for use of CPNI.

- If SouthernLINC Wireless subsequently chooses to take any action for which customer approval is required, the company will implement policies and practices for seeking opt-out or opt-in approval from its customers pursuant to, and in accordance with, section 64.2001 *et seq.* of the Commission's rules, 47 C.F.R. § 64.2001 *et seq*, and obtain approval from its customers pursuant to these policies and practices before taking such action.

NOTICE REQUIRED FOR USE OF CPNI – SECTION 64.2008

- SouthernLINC Wireless does not solicit the approval of customers for use of CPNI, because the company does not use, disclose or permit access to CPNI for any purpose that would require the company to solicit such approval.

- If SouthernLINC Wireless subsequently chooses to take any action for which the company must solicit the approval of its customers for the use CPNI, the company will provide notice to its customers pursuant to, and in accordance with, the requirements of section 64.2008 of the Commission's rules. 47 C.F.R. § 64.2008.

SAFEGUARDS REQUIRED FOR USE OF CPNI – SECTION 64.2009

- SouthernLINC Wireless does not solicit the approval of customers for use of CPNI, because the company does not use, disclose or permit access to CPNI for any purpose that would require the company to solicit such approval. If SouthernLINC Wireless subsequently chooses to take any action for which the company must solicit the approval of its customers for the use CPNI, the company will implement a system by which the status of the customer's CPNI approval can be clearly established prior to the use of CPNI.

- SouthernLINC Wireless has trained its personnel as to when they are and are not authorized to use CPNI, and the company has an established, express disciplinary process that can result in disciplinary actions up to, and including, termination of employment.

- SouthernLINC Wireless does not use, disclose or permit access to CPNI for the purpose of marketing the products or services of itself, its affiliates or any third parties (beyond permitting SouthernLINC Wireless employees to use CPNI during telephone calls with existing customers in order to discuss rate plans and service offerings among the categories of service to which the customer already subscribes), or for any purpose that would require SouthernLINC Wireless to solicit customer approval before doing so. If SouthernLINC Wireless subsequently chooses to use, disclose or permit access to CPNI for the purpose of marketing the products or services of itself, its affiliates or any third parties, the company will maintain a record of (1) its own and its affiliates' sales and marketing campaigns that use its customers' CPNI, and (2) all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. SouthernLINC Wireless will retain the record for a minimum of one year.

- SouthernLINC Wireless has established a supervisory review process regarding its compliance with section 64.2001 *et seq.* of the Commission's rules, 47 C.F.R. § 64.2001 *et seq,* for outbound marketing situations. SouthernLINC Wireless also maintains records of its compliance for a minimum period of one year. SouthernLINC

Wireless sales and marketing personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

- An officer of SouthernLINC Wireless signs and files with the Commission a compliance certificate on an annual basis. The officer states in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with section 64.2001 *et seq.* of the Commission's rules, 47 C.F.R. § 64.2001 *et seq.* SouthernLINC Wireless also provides a statement accompanying the certificate explaining how its operating procedures ensure that it is in compliance with section 64.2001 *et seq.* of the Commission's rules, 47 C.F.R. § 64.2001 *et seq.* In addition, SouthernLINC Wireless includes an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. The company makes this filing annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36 for data pertaining to the previous calendar year.

- SouthernLINC Wireless does not solicit opt-out approval from its customers for use of CPNI. If SouthernLINC Wireless subsequently chooses to take any action for which the company must solicit the opt-out approval of its customers for the use of CPNI, the company will provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly to such a degree that customers' inability to opt-out is more than an anomaly. The notice will be made pursuant to, and in accordance with, section 64.2009(f) of the Commission's rules, 47 C.F.R. § 64.2009(f).

SAFEGUARDS ON THE DISCLOSURE OF CPNI – SECTION 64.2010

- SouthernLINC Wireless has implemented reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI.

- SouthernLINC Wireless does not disclose call detail information over the telephone during customer-initiated telephone contact.

- SouthernLINC Wireless discloses CPNI at its retail and office locations only to customers who first present the company or its agents with a valid photo ID matching the customer's account information.

- SouthernLINC Wireless does not provide online access to CPNI unless a customer has signed up to pay their bill on-line. On-line bill payment requires a customer to establish a password for their account in accordance with the requirements of section 64.2010 of the Commission's rules, 47 C.F.R. § 64.2010.

- To establish a password, SouthernLINC Wireless authenticates the customer without the use of readily available biographical information or account information. If a

customer cannot provide the correct password, the customer must establish a new password in accordance with the requirements of section 64.2010 of the Commission's rules, 47 C.F.R. § 64.2010.

- SouthernLINC Wireless notifies customers immediately whenever a password, online account, or address of record, whether postal or electronic, is created or changed. The notification is made by a post card mailing to the previous address of record, or in the event of a changed password or email, by email to the previous e-mail of record. The notification does not reveal the nature of the changed information.

- SouthernLINC Wireless binds itself contractually to authentication regimes other than those described in section 64.2010 of the Commission's rules, 47 C.F.R. § 64.2010, for services the company provides to business customers that have both a dedicated account representative and a contract that specifically addresses the SouthernLINC Wireless's protection of CPNI.

NOTIFICATION OF CPNI SECURITY BREACHES - SECTION 64.2011

- SouthernLINC Wireless will notify law enforcement of a breach of its customers' CPNI as provided in section 64.2011 of the Commission's rules, 47 C.F.R. § 64.2011.

- SouthernLINC Wireless will not notify its customers or disclose the breach publicly, whether voluntarily or under state or local law or these rules, until the company has completed the process of notifying law enforcement pursuant to paragraph (b) of section 64.2011 of the Commission's rules, 47 C.F.R. § 64.2011(b).

- After SouthernLINC Wireless has completed the process of notifying law enforcement pursuant to paragraph (b) of section 64.2011 of the Commission's rules, 47 C.F.R. § 64.2011(b), it will notify its customers of a breach of those customers' CPNI.

- SouthernLINC Wireless will maintain a record of any breaches discovered, notifications made to the USSS and the FBI pursuant to paragraph (b) of section 64.2011 of the Commission's rules, 47 C.F.R. § 64.2011(b), and notifications made to customers. The record will include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. SouthernLINC Wireless will retain the record for a minimum of 2 years.