March 1, 2016
Via ECFS Filing

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

RE: Telephone Associates, Inc. – 499 Filer ID: 817174
CY 2015 Annual CPNI Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2015 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 Telephone Associates, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon R. Warren

Sharon R. Warren
Consultant to Telephone Associates, Inc.

cc: Cecily Evans - TelAssociates
file: TelAssociates - FCC
tms: FCx1601

Enclosures
SW/sp

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:	Calendar Year 2015
Name of Company covered by this certification:	**Telephone Associates, Inc.**
Form 499 Filer ID:	817174
Name of Signatory:	Kevin Hopkins
Title of Signatory:	President

I, Kevin Hopkins, certify and state that:

1. I am the President of Telephone Associates, Inc. ("Company") and, acting as an agent of the Company, that I have personal knowledge that Telephone Associates, Inc. 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 as Exhibit A, 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 any actions (proceedings instituted or petitions filed by the 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 any 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.

CEO

Kevin Hopkins, President
Telephone Associates, Inc.

3/1/16

Date

Exhibit A
Statement of CPNI Procedures and Compliance

Telephone Associates, Inc.

Calendar Year 2015

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

Telephone Associates, Inc.

Statement of CPNI Procedures and Compliance – Calendar Year 2015

Telephone Associates, Inc. ("Telephone Associates" or "Company") provides local, long distance and Internet access (dial-up and DSL) services to its customers. Telephone Associates does not use CPNI for sales and marketing campaigns and has processes in place to ensure that is employees do not improperly use or disclose CPNI. Telephone Associates' actions described below are designed to thwart efforts by pretexters to obtain Company customer CPNI.

Telephone Associates has a CPNI manual with the rules, requirements and Company processes included. Telephone Associates requires that all access to CPNI be approved by a supervisor with knowledge of the FCC's CPNI requirements. Information regarding CPNI, including rules and procedures, are available to Customer Service Representatives, along with training on policies and procedures, to ensure its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. Corresponding disciplinary procedures are in place for violations of CPNI disclosure.

All customers in 2015 were provided information regarding CPNI: "Important Message About Your Customer Proprietary Network Information" which requested customers to select a password and a non-biographical verification question. Customers who did not reply and who contact Telephone Associates are verified through a call-back to the telephone number of record, or must provide call detail on the telephone call in order for Telephone Associates to verify the customer. At that time, a password is set up with the customer.

Telephone Associates maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

Telephone Associates has in place reasonable means to discover and protect against attempts to gain unauthorized access to its customers' CPNI. Telephone Associates has instituted an authentication procedure to safeguard the disclosure of CPNI over the telephone. The Telephone Associates' billing system provides a screen to its Service Representatives which automatically requires the Service Representative to ask for the customer's password. Also, fields have been established in the Service Representative system to document the authenticating backup verification question and answer. There is also a data field for each customer account which lists any changes to access of CPNI information that have occurred as a result of Company/Customer telephone contact or inquiry, such as name, date and password used to access the information, and Service Representative who made the change in the database. Reports can be run on all information in the Telephone Associates database related to CPNI. Those reports are only provided to Telephone Associates CPNI officers who have been given security roles.

Telephone Associates requires a password to be provided to verify the customer's identity prior to release of any call detail information over the telephone. Service Representatives are trained not to prompt the customer for needed information. If the customer cannot provide the password, the call detail information will only be sent to the address of record, or the customer can be called back at the telephone number of record on file with Telephone Associates.

Further, Telephone Associates 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. The back-up authentication procedure requires the customer to determine the Verification Question and Answer.

Should a customer come into the Telephone Associates office requesting information or wishing to review call detail information, the customer is asked to provide a valid photo ID.

Telephone Associates has instituted authentication procedures to safeguard the disclosure of CPNI on-line. The Company's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Telephone Associates authenticates customers by requiring a sign-on and unique password. 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 CPNI. Customers are also required to contact Telephone Associates if they want to change their account information. Unless the appropriate password is provided, Telephone Associates does not allow on-line access to CPNI.

Telephone Associates 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. The Company's back-up authentication procedure operates as follows: All customers, upon initial online registration, must select specific questions and provide the answers to those questions. The answers to these questions must be provided correctly to retrieve their account information in the event their login credentials are forgotten.

Telephone Associates has put into place procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or stolen 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.

Telephone Associates has in place procedures to notify law enforcement within seven (7) business days 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. Telephone Associates maintains a log of all breaches discovered and notifications made to the United States Secret Service (USSS) and the FBI, and to customers.

Telephone Associates has not taken any actions against data brokers in the last year.

Telephone Associates did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2015.