

# SouthEast Telephone

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

### EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date Filed: February 27, 2009

Name of company covered by this certification: SouthEast Telephone, Inc.

Form 499 Filer ID: 808375

Name of Signatory: Carla J. Reichelderfer

Title of Signatory: Chief Operating Officer

I, Carla J. Reichelderfer, 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, Attachment A, explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed Carla J. Reichelderfer  
Carla J. Reichelderfer  
Chief Operating Officer

Date 2/27/09

# ***SouthEast Telephone***

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## **ATTACHMENT A Statement of CPNI Procedures and Compliance**

### **USE OF CPNI**

SouthEast Telephone, Inc. ("SouthEast") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. SouthEast has trained its personnel not to use CPNI for marketing purposes. Should SouthEast 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.

### **PROTECTION OF CPNI**

SouthEast has put into place processes to safeguard its customers' CPNI/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. The Company establishes a PIN number in CRM that is only available for Customer Care Representatives to see and or change.

Although it has never occurred, SouthEast will maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

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

SouthEast has instituted authentication procedures to safeguard the disclosure of call detail over the telephone. SouthEast's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. All customers are required to establish a password/personal identification number (PIN) Number and security question without the use of readily available biographical information or account information if they want to receive call detail over the telephone. If the appropriate password is not provided, SouthEast does not disclose call detail over the telephone.

SouthEast 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. There is a selection of five security questions that do not utilize biographical information.

Company may disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, but only if the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative.

Company 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. This notification is mailed to the address of record.

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## **DISCLOSURE OF CPNI ONLINE**

SouthEast has instituted authentication procedures to safeguard the disclosure of CPNI on-line. SouthEast's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Customers are required to establish a password/PIN and security question, without the use of readily available biographical information or account information, at the time of account set up. Unless the appropriate password/PIN is provided, SouthEast does not allow on-line access to CPNI.

SouthEast 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. There is a selection of five security questions that do not utilize biographical information.

## **DISCLOSURE OF CPNI AT RETAIL LOCATIONS**

Company discloses CPNI at its retail locations only if the customer has presented a valid photo ID matching his/her account information. In lieu of presenting a photo ID, customers can give their PIN or provide the answer to their pre-selected security question.

## **NOTIFICATION TO LAW ENFORCEMENT**

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. SouthEast customers are notified via letter of any breach of their CPNI, according to the time frames set forth in the FCC rules.

SouthEast will maintain records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

## **NOTIFICATION TO CUSTOMERS REGARDING CHANGES TO THEIR ACCOUNT**

Company has in place procedures to notify customers immediately when a change is made to the PIN, security question, or address of record.

## **ACTIONS AGAINST DATA BROKERS**

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

## **CUSTOMER COMPLAINTS ABOUT CPNI BREACHES**

Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.

## **INFORMATION ABOUT PRETEXTERS**

SouthEast has researched general information regarding methods used by pretexters, phishers and social engineers, and has taken steps to guard disclosure of CPNI via these methods.