



February 16, 2010  
Filed Via ECFS

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

**RE: Southeastern Services, Inc. – 2009 Annual CPNI Certification Filing  
EB Docket No. 06-36**

Dear Ms. Dortch:

Enclosed for filing please find the Annual CPNI Compliance Certification for calendar year 2009 submitted on behalf of Southeastern Services, Inc., as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 407-740-3004 or via email to [rnorton@tminc.com](mailto:rnorton@tminc.com).

Sincerely,

Robin Norton  
Consultant to Southeastern Services, Inc.

RN/lm

cc: Best Copy and Printing, Inc. - [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)  
cc: Marc Woods - Southeastern  
file: Southeastern - FCC  
tms: FCCx1001



**Attachment A**  
**Statement of CPNI Procedures and Compliance**

**Statement of CPNI Procedures and Compliance  
For 2009  
Southeastern Services, Inc.**

Southeastern Services, Inc. is a small rural CLEC providing local and long distance service to business customers in one state.

We do not use or permit access to CPNI to market any telecommunications or non-telecommunications services. We have has trained our personnel not to use CPNI for marketing purposes. Should we elect to use CPNI in future marketing efforts, we 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.

As explained below, we have put into place processes to safeguard its customers' CPNI and 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.

We do not disclose CPNI online. We currently provide and have in place well established procedures for providing call detail over the phone. All new customers are currently required to come to our office when initiating service. At this time, a photo ID is required. In the event a customer's password is lost or stolen, the customer must answer security questions which were determined at the time service was initiated and a new password is set up. No call detail will be disclosed unless the customer provides a valid password or provides the call detail information that is the subject of the inquiry without a customer service representative's assistance. If the customer does not provide a password or cannot provide the call detail information without a customer service representative's assistance, then we will only send the call detail to the customers address of record or by calling the customer at the telephone number on record.

For billing inquiries, changes to account information or to add, delete, or change services, customers are required to come into the office and present a valid photo ID.

Employees are trained and fully understand the fact that we do not allow customer information to be given out for any reason. If using a customer's personal information to maintain an account, employees are trained to properly dispose of or return the customer's information to its secured location.

We have procedures in place 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.

We have not experienced any breaches of CPNI to date, but will maintain records, either written or electronic, of any and all breaches discovered and notifications made to the USSS and the FBI, and to customers.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2009.

We do not have any information with respect to the processes Pretexters are using to attempt to access CPNI.