



February 21, 2013  
Via ECFS Filing

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

RE: Custom Network Solutions, Inc.  
EB Docket No. 06-36 - 2013 CPNI Certification

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2013-02, DA 13-61, EB Docket No. 06-36, released January 16, 2013 and pursuant to 47 C.F.R. § 64.2009(e), Custom Network Solutions, Inc. hereby files its Certification of Customer Proprietary Network information (CPNI) and its supporting Statement for the year 2012. Please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3006 or [croesel@tminc.com](mailto:croesel@tminc.com) if you have any questions about this filing.

Sincerely,

Carey Roesel  
Consultant to Custom Network Solutions, Inc.

cc: Marc Rozar - CNS  
file: CNS - FCC CPNI  
tms: FCCx1301

Enclosures  
CR/gs



Attachment A  
Statement of CPNI Procedures and Compliance

**Custom Network Solutions, Inc.**

Covering Calendar Year 2012

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

**EB DOCKET 06-36**

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Custom Network Solutions, Inc.

Statement of CPNI Procedures and Compliance (2012)

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

CNS Customer Service personnel do not release CPNI or call detail information to incoming callers. CNS Customer Service representatives call the authorized Customer Contact at their Business Telephone Number to release customer requested CPNI. CNS will only release CPNI or call detail information to third parties after receiving both written and verbal consent from the authorized Customer Contact.

Customers are notified of account changes without revealing the change information or sending the notification to a changed or new account contact. This is done via telephone to the Customer Contact of record. All requests from customers for information must be made via email from the company's authorized representative from their company email address, or CNS will call the authorized person at the company telephone number.

CNS has a webmail link and a broadband link on its website. The only information customers can obtain through these portals is Internet Utilization reports, which are nothing more specific than a summary report of total data usage. Access is via customer provided password. CNS does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical or account information and customer notification of account changes.

CNS does not have retail locations and therefore does not allow in-store access to CPNI.

CNS has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI.

Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

Custom Network Solutions, Inc.

Statement of CPNI Procedures and Compliance (2012)  
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CNS maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

The 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. Such procedures require notification and management of the process by the Company President.

The Company has not taken any actions against data brokers in calendar year 2012.

The Company did not receive any complaints about unauthorized release or Disclosure of CPNI during 2012.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.