



February 18, 2014  
Via ECFS Filing

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

RE: Universal Connectivity, Inc.  
EB Docket No. 06-36; Calendar Year 2013

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2013 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 Universal Connectivity, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3001 or via email to [tforte@tminc.com](mailto:tforte@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Thomas M. Forte  
Thomas M. Forte  
Consultant to Universal Connectivity, Inc.

cc: Lori Myrick - Universal Connectivity  
file: Universal Connectivity - FCC - Other  
tms: FCx1401

Enclosures  
TF/mp

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 2013  
Name of Company covered by this certification: Universal Connectivity, Inc.  
Form 499 Filer ID: 823534  
Name of Signatory: James Smith  
Title of Signatory: President

I, James Smith, certify and state that:

1. I am President of Universal Connectivity, Inc. 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.*
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 Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions (i.e., 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.

  
\_\_\_\_\_  
James Smith, President  
Universal Connectivity, Inc.

\_\_\_\_\_  
Date

2/12/2014

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A  
Explanation of actions taken against data brokers – not applicable  
Summary of customer complaints – not applicable

Attachment A  
Statement of CPNI Procedures and Compliance

**Universal Connectivity, Inc.**

Calendar Year 2013

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
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Universal Connectivity, Inc.

Statement of CPNI Procedures and Compliance

Universal Connectivity, Inc. ("Company" or "UCI") provides traditional and VOIP telecommunications and internet access services to a small number of business customers. The company does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. UCI has trained its personnel not to use CPNI for marketing purposes. Should UCI 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.

UCI Customer Service personnel do not release CPNI or call detail information to incoming callers. UCI will only release CPNI or call detail information after receiving both written and verbal consent from the authorized Customer Contact and will release information only to the authorized Customer Contact for each account.

UCI does not provide on-line access to customers and therefore 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. Information regarding customer privacy is posted on the company's website.

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

UCI training procedures and a corresponding disciplinary process ensures 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.

Universal Connectivity, Inc.

Statement of CPNI Procedures and Compliance  
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UCI 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 2013.

The Company did not receive any complaints about unauthorized release or Disclosure of CPNI through December 31, 2013.

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