February 28, 2014
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

RE:	**Sage Telecom, Inc.**	**Form 499 Filer ID:**	**819036**
	Sage Telecom of Texas, L.P.	**Form 499 Filer ID:**	**826362**
	Sage Telecom Communications, LLC	**Form 499 Filer ID:**	**829734**
	Annual CPNI Certification CY 2013		
	EB Docket No. 06-36		

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 Sage Telecom, Inc. and its affiliates Sage Telecom of Texas, L.P. and Sage Telecom Communications, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Carey Roesel
Carey Roesel
Consultant to Sage Telecom, Inc. and affilates

cc: Cassandra (Sandi) Milligan - Sage
file: Sage - FCC - Other
tms: FCx1401

Enclosures
CR/im

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 2014: Covering calendar year 2013

Name of company(s) covered by this certification:

Sage Telecom, Inc.	**Form 499 Filer ID: 819036**
Sage Telecom of Texas, L.P.	**Form 499 Filer ID: 826362**
Sage Telecom Communications, LLC	**Form 499 Filer ID: 829734**

Name of signatory: Jeffrey B. Clark

Title of signatory: Chief Executive Officer

I, Jeffrey B. Clark, certify that

1. I am the Chief Executive Officer of Sage Telecom, Inc., ("Sage Telecom") and Sage Telecom Communications, LLC; Sage Telecom is the sole general partner of Sage Telecom of Texas L.P.; I am duly authorized by Sage Telecom to sign the instant certification of Sage Telecom of Texas, L.P. in accordance with the terms of the underlying partnership agreement of Sage Telecom of Texas, L.P.; and, acting as an agent of Sage Telecom, Inc. and Sage Telecom of Texas, L.P., and Sage Telecom Communications, LLC (collectively "Sage"), 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.

Jeffrey B. Clark, Chief Executive Officer

2/24/14
Date

Attachments: Accompanying Statement explaining CPNI procedures

Attachment A
Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance

STATEMENT REGARDING OPERATING PROCEDURES IMPLEMENTING 47 C.F.R. PART 64 SUBPART U GOVERNING USE OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

The following statement explains how the operating procedures of Sage Telecom, Inc. and Sage Telecom of Texas, L.P., and Sage Telecom Communications, LLC (collectively "Sage") ensure that it is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. Part 64 Subpart U and is relevant to calendar year 2013.

I. Use of customer proprietary network information without customer approval.

A. Sage may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already subscribes from Sage without customer approval.

(1) If a customer subscribes to Sage's local and interexchange services, Sage may share that customer's CPNI with its affiliated entities that provide a service offering to the customer.

(2) If a customer does not subscribe to more than one of Sage's offerings, Sage is not permitted to share CPNI with its affiliates, except as provided in § 64.2007(b) of the FCC's rules.

B. Sage may not use, disclose, or permit access to CPNI to market to customers any service offerings that are within a category of service to which the subscriber does not already subscribe from Sage, unless Sage has customer approval to do so, except as described in Section I.C.

(1) Sage may use, disclose, or permit access to CPNI, without customer approval, for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

(2) Sage may not use, disclose or permit access to CPNI to identify or track customers that call competing service providers. For example, Sage may not use local service CPNI to track all customers that call local service competitors.

C. Sage may use, disclose, or permit access to CPNI, without customer approval, as follows:

(1) Sage may use, disclose, or permit access to CPNI, in its provision of inside wiring installation, maintenance, and repair services.

(2) Sage may use CPNI to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features.

D. Sage may use, disclose, or permit access to CPNI to initiate, render, bill and collect for telecommunications services.

E. Sage may use, disclose, or permit access to CPNI to protect Sage's rights or property, or to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, Sage services.

Sage presently offers local and interexchange service to its customers.

Sage's written practices prohibit the sharing of CPNI between affiliates with limited permissible exceptions.

Sage requires all of its employees to read such written practices, and requires an annual written acknowledgement.

Failure to comply may result in disciplinary action, up to and including termination, as described in Section IV below.

Sage does not use, disclose, or permit access to CPNI to market to customers any service offerings that are within a category of service to which the subscriber does not already subscribe absent customer approval.

II. Approval required for use of customer proprietary network information.

A. Sage may obtain customer approval through written, oral or electronic methods.

(1) Where Sage obtains oral approval, it bears the burden of demonstrating that such approval has been given in compliance with the FCC rules.

(2) A customer's approval or disapproval obtained by Sage to use, disclose, or permit access to the customer's CPNI for the use of CPNI outside of the customer's total service relationship with Sage, must remain in effect until the customer revokes or limits such approval or disapproval.

(3) Sage must maintain records of notification and approval, whether oral, written or electronic, for at least one year.

B. Use of Opt-Out and Opt-In Approval Processes.

(1) Except where use, disclosure, or access to CPNI is otherwise permitted without prior customer approval (as described above), Sage only uses, discloses or permits access to CPNI upon opt-out or opt-in approval, consistent with Section 64.2007 of the Commission's rules.

Sage may, subject to opt-out approval or opt-in approval, use its customers' individually identifiable CPNI for the purpose of marketing communications-related services to that customer. Sage may, subject to opt-out approval or opt-in approval, disclose its customer's individually identifiable CPNI, for the purpose of marketing communications-related services to that customer, to its agents, and its affiliates that provide communications-related services. Sage may also permit such persons or entities to obtain access to such CPNI for such purposes. Any such disclosure to or access provided to joint venture partners and independent contractors shall be subject to the safeguards set forth in Section II.B(2).

(2) Joint Venture/Contractor Safeguards. If Sage discloses or provides access to CPNI to its joint venture partners or independent contractors outside the customer's total services, it shall obtain opt-in approval and will enter into confidentiality agreements with independent contractors or joint venture partners that:

(i) Require that the independent contractor or joint venture partner use the CPNI only for the purpose of marketing or providing the communications-related services for which that CPNI has been provided;

(ii) Disallow the independent contractor or joint venture partner from using, allowing access to, or disclosing the CPNI to any other party, unless required to make such disclosure under force of law; and

(iii) Require that the independent contractor or joint venture partner have appropriate protections in place to ensure the ongoing confidentiality of consumers' CPNI.

(3) Except for use and disclosure of CPNI that is permitted without customer approval under Section I, or that is described Section II.B(1), or as otherwise provided in section 222 of the Communications Act of 1934, as amended, Sage may only use, disclose, or permit access to its customer's individually identifiable CPNI subject to opt-in approval.

Sage's policies and procedures require customer approval through written, oral, or electronic methods in accordance with the FCC rules. Prior to any use of CPNI that requires customer approval, Sage obtains such approval. When such approval is obtained, Sage retains a record of that approval for at least one year. Where Sage obtains oral approval such approval or denial of approval is recorded and retained by Sage for at least one year. Any sharing of CPNI with an independent contractor is in accordance with section 64.2007 of the rules and section 222(c) of the Act.

III. Notice required for use of customer proprietary network information.

A. Notification, Generally.

(1) Prior to any solicitation for customer approval, Sage must provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.

(2) Sage must maintain records of notification, whether oral, written or electronic, for at least one year.

B. Individual notice to customers must be provided when soliciting approval to use, disclose, or permit access to customers' CPNI.

C. Content of Notice.

Customer notification must provide sufficient information to enable the customer to make an informed decision as to whether to permit Sage to use, disclose, or permit access to, the customer's CPNI.

(1) The notification must state that the customer has a right, and Sage has a duty, under federal law, to protect the confidentiality of CPNI.

(2) The notification must specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.

(3) The notification must advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, Sage may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.

(4) The notification must be comprehensible and must not be misleading.

(5) If written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.

(6) If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.

(7) Sage may state in the notification that the customer's approval to use CPNI may enhance Sage's ability to offer products and services tailored to the customer's needs. Sage also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

(8) Sage may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

(9) The notification must state that any approval or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from Sage is valid until the customer affirmatively revokes or limits such approval or denial.

(10) Sage's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

D. Notice Requirements Specific to Opt-Out.

(1) Sage must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except as provided in paragraph F of this section). The contents of any such notification must comply with the requirements of paragraph C of this section.

(2) Sage must wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. Sage may, in its discretion, provide for a longer period. Sage must notify customers as to the applicable waiting period for a response before approval is assumed.

(i) In the case of an electronic form of notification, the waiting period shall begin to run from the date on which the notification was sent; and

(ii) In the case of notification by mail, the waiting period shall begin to run on the third day following the date that the notification was mailed.

(3) Insofar as Sage is using the opt-out mechanism, it must provide notices to its customers every two years.

(4) If Sage uses e-mail to provide opt-out notices, it must comply with the following requirements in addition to the requirements generally applicable to notification:

(i) Sage must obtain express, verifiable, prior approval from consumers to send notices via e-mail regarding its service in general, or CPNI in particular;

(ii) Sage must allow customers to reply directly to e-mails containing CPNI notices in order to opt-out;

(iii) Opt-out e-mail notices that are returned to Sage as undeliverable must be sent to the customer in another form before Sage may consider the customer to have received notice;

(iv) Sage must ensure that the subject line of the message clearly and accurately identifies the subject matter of the e-mail; and

(v) Sage must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. Sage may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

E. Notice Requirements Specific to Opt-In.

Sage may provide notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the requirements of paragraph C of this section.

F. Notice Requirements Specific to One-Time Use of CPNI.

(1) Sage may use oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether Sage uses opt-out or opt-in approval based on the nature of the contact.

(2) The contents of any such notification must comply with the requirements of paragraph C of this section, except that Sage may omit any of the following notice provisions if not relevant to the limited use for which Sage seeks CPNI:

(i) Sage need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election;

(ii) Sage need not advise customers that they may share CPNI with their affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party;

(iii) Sage need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as Sage explains to customers that the scope of the approval Sage seeks is limited to one-time use; and

(iv) Sage may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as Sage clearly communicates that the customer can deny access to his CPNI for the call.

Prior to any solicitation for customer approval, Sage notifies each individual customer of their rights to restrict use of, disclosure of, and access to their CPNI. Such notification is provided and recorded in compliance with 47 C.F.R. § 64.2008. Prior to any use of CPNI that requires customer approval, Sage obtains such approval in compliance with 47 C.F.R. § 64.2008. When such approval is obtained, Sage retains record of that notice and approval for at least one year. In compliance with 47 C.F.R. § 64.2008, Sage's policies and procedures provide customers proper notice and an opportunity to opt-out before using, disclosing, or permitting access to CPNI.

IV. Safeguards required for use of customer proprietary network information.

A. Sage must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

B. Sage may release call detail information during a customer initiated telephone contact only if reasonable authentication procedures are complied with and (1) the customer provides Sage with a pre-established password, (2) Sage, at the customer's request, sends the call detail information to the customer's address of record provided the address of record has been associated with the account for at least thirty days, or (3) when Sage calls the telephone number of record to disclose the call detail information. Sage is permitted to create a back-up customer authentication method for lost or forgotten passwords that does not employ readily available biographical information. Sage is also prohibited from releasing call detail information during a retail visit without the appropriate password or valid photo identification.

However, if during a customer-initiated telephone contact, the customer is able to provide to Sage personnel all of the call detail information necessary to address a customer service issue (i.e., the telephone number called, when it was called, and if applicable the amount charged for the call), then Sage personnel are permitted to proceed with its routine customer care procedures in relation to such call detail information.

C. Sage must authenticate a customer without readily available biographical or account information prior to allowing the customer on-line access to CPNI related telecommunication service account information with respect to all existing online accounts. Once authenticated, the customer may only obtain on-line access to CPNI related telecommunications service account information through a password.

D. Sage is required to notify customers immediately when a password or back-up means of authentication for lost or forgotten passwords, on-line account, or address of record is created or changed. Such notification is not required when the customer initiates service, including the selection of a password.

E. Business customers are exempt from the password requirements if bound through contractual customer agreement with Sage, serviced by a dedicated Sage account representative as the primary contact, and within the contract Sage is responsible to address its CPNI obligations. If, at any point, the business customer must go through a call center to reach a customer service representative, then the exemption does not apply.

F. Sage must train its personnel as to when they are and are not authorized to use CPNI, and Sage must have an express disciplinary process in place.

G. Sage must maintain a record, electronically or in some other manner, of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. Sage shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Sage shall retain the record for a minimum of one year.

H. Sage must establish a supervisory review process regarding its compliance with the FCC's CPNI rules for outbound marketing situations and maintain records of its compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

I. Sage must take responsible measures to discover and protect against attempts to gain unauthorized access to CPNI, which may include encryption of its databases. Sage must properly authenticate a customer prior to disclosing CPNI based on a customer-initiated telephone contact, on-line account access, or an in-store visit.

J. Sage must have an officer, as an agent of Sage, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. Sage must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. The statement must disclose any actions taken against data brokers and a summary of all consumer complaints received in the previous calendar year regarding the unauthorized release of CPNI. The certification and statement must include a list of actions taken against data brokers (if any) during the prior calendar year, as well as a summary of all consumer complaints received in that period, together with information regarding pretexters' processes for attempting to access CPNI and steps taken to protect CPNI from pretexters.

K. Sage must provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(1) The notice shall be in the form of a letter, and shall include Sage Telecom, Inc.'s (or Sage Telecom of Texas, L.P.'s) name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2) Such notice must be submitted even if Sage offers other methods by which consumers may opt-out.

L. Sage has a general duty to first inform federal law enforcement agencies, followed up by notification to affected customers, after reasonable determination of a breach of its customers' CPNI.

M. Sage must file an electronic notification to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) within seven (7) business days through the central reporting facility furnished by the Commission.

N. Sage is prohibited from notifying customers' or the general public of the breach until seven (7) business days have passed after notification to the USSS and FBI unless under certain specified circumstances: (a) Sage identifies an "extraordinary need to notify customers" before that period or (b) An ongoing or potential investigation or national security requires customer disclosure to be potentially delayed for up to thirty (30) days. Sage must notify the affected customer(s) after the applicable period.

O. Sage must maintain a record, whether electronically or in some other manner of any breaches discovered, notifications made to the USSS or FBI and notifications made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Records must be maintained for a two (2) year period.

Sage's policies and procedures require all customers, business and residential, to provide a pre-established password in the form of a four-digit access code, or to authenticate via a pre-established challenge question before releasing any call detail information during a customer initiated telephone contact or online account access. Sage requires that all customers are authenticated without the use of readily available biographical information or account information. However, if during a customer-initiated telephone contact, the customer is able to provide (without assistance from Sage personnel) all of the call detail information necessary to address a customer service issue, then Sage personnel are permitted to proceed with its routine customer care procedures.

Before releasing call detail information for an in-store, or in Sage's current case, "in-office" visit, Sage requires the customer to present a valid photo ID matching the customer's account information. Otherwise, at the customer's request Sage may provide call detail information by sending it to the customer's address of record or by calling the customer at the telephone number of record.

Sage's policies and procedures require that customers are to be notified immediately of the creation or change of a password, back-up means of authentication for lost or forgotten passwords, on-line account or address of record.

Sage's policies and procedures, as set forth in its written practices outlining the use of CPNI, require that all of its employees review and be trained in such written practices and sign an annual written acknowledgement. It is a violation of such written practices to use, disclose or permit CPNI outside of Sage or otherwise in contravention of these policies. Any employee that is found to have violated this policy will be subject to disciplinary action up to and including termination.

To confirm compliance with 47 C.F.R. § 64.2009, Sage's operating procedures pertaining to CPNI are reviewed annually by the Regulatory Affairs Department and certified by an officer of the company that has personal knowledge of these procedures.

In compliance with 47 C.F.R. § 64.2009, Sage maintains a record, for at least one year, of all sales and marketing campaigns, and a record of all instances where CPNI is disclosed to third parties, or where third parties are allowed access to CPNI.

Sage's operating procedures for reporting a potential breach of its customers' CPNI include an electronic form to be populated by the employee first learning of the potential breach, and then forwarded to an internal email address for submission to our Regulatory Affairs department for reasonable determination of a breach. Upon determination that a breach has occurred, the breach is reported and maintained pursuant to 47 C.F.R. § 64.2011.

V. Supplemental Information

The FCC's rules require that the annual certification filed pursuant to 47 C.F.R § 64.2009(e) disclose any actions taken against data brokers and a summary of all consumer complaints received in the previous calendar year regarding the unauthorized release of CPNI. A list of actions taken against data brokers (if any) during the prior calendar year, as well as a summary of all consumer complaints received in that period, are attached, together with information regarding pretexters' processes for attempting to access CPNI and steps taken to protect CPNI from pretexters.

ATTACHMENT

ACTIONS TAKEN AGAINST DATA BROKERS IN 2013

Forum	Description of Action(s)
Court	None
State Commissions	None
FCC	None

SUMMARY OF CUSTOMER COMPLAINTS CONCERNING UNAUTHORIZED RELEASE OF CPNI IN 2013

Nature of Complaint	Total Number
Improper Access by Employees	None
Improper Disclosure to Unauthorized Individuals	None
Improper Access to Online Information by Unauthorized Individuals	None
Other	None

PRETEXTERS' ATTEMPTS TO ACCESS CPNI AND STEPS TO PROTECT CPNI FROM PRETEXTERS

Sage Telecom has no additional information beyond what has already been reported to the FCC and to Congress with respect to pretexters' practices.

In addition to the compliance efforts described in the statement, access to CPNI is highly restricted and controlled through the use of active directory security and other measures. For example, special passwords are assigned on a limited approval-only basis. Vice President approval is required for such access. Passwords are changed periodically. Also, strict controls are in place involving responses to law enforcement agencies that serve Sage with valid legal demands (i.e., court-ordered subpoenas) for CPNI; Sage will not supply CPNI to any law enforcement agency that does not produce a valid legal demand. Further, encryption and other security practices are utilized when CPNI is transmitted electronically.