

January 2, 2020

Federal Communications Commission
Office of the Secretary
Marlene H. Dortch
445 12th Street, SW, Suite TW-A325
Washington, DC 20554**Annual 47 C.F.R. S: 64.2009(e) CPNI Compliance Certification**

Annual 64.2009(e) CPNI Certification for 2020 covering the prior calendar year 2019

Date filed: January 2, 2020

Name of company covered by this certification: Carolina Digital Phone, Inc.

Form 499 Filer ID: 829591

Name of signatory: James N Smith, Jr.

Title of signatory: CEO

I, James N Smith Jr, 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 Federal Communications Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification 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, record keeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., 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.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. The company notifies customers of their rights to restrict to, us of, and disclosure of their CPNI. Periodic notices and one-time notices are provided to customers as appropriate. Such notices may be provided through multiple methods including bill inserts, customer newsletters and emails, notices included on the Company's web site and notices during telephone contact with a customer.

The company represents and warrants that the above certification is consistent with 47. C.F.R. S: 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 N Smith Jr, CEO

Carolina Digital Phone Inc
Accompanying Statement to Annual Certification of CPNI
Steps Taken By Company to Ensure the Confidentiality of CPNI Records
January 1, 2020

Carolina Digital Phone Inc is a small company and reseller of telecommunications services. Our primary business is as a hosted Interconnected-VoIP telecommunications provider of cloud-based hosted telephone services and SIP trunking services. Additionally the company sell Internet Services, web site and application hosting, email applications, data center server and equipment colocation and Consulting Services.

Many of our customers are governmental agencies, libraries and schools, where projects are awarded through a public bid process or through the E-rate system. For those customers, Carolina Digital Phone Inc performs marketing primarily through federal, state and local government public bid processes. Our company follows the rules for each bid, which ensure fairness for each bidder.

We as a company simply do not use customers' CPNI (or other private customer information) in marketing or otherwise, nor do we sell or give private customer information or CPNI to third parties.

All private customer information is kept secure. Security practices are maintained in compliance with federal government encryption standards and in accordance with the terms of our contracts with the government.

Our Company Policy with regard to CPNI and employee handling of CPNI is as follows:

1. Failure by an employee to abide by the applicable CPNI policies and procedures is cause for discipline, up to and including employment termination.
2. All Company employees during their annual Human Resources Policy review receive an overview of CPNI requirements.
3. All customer-interfacing employees are required to attend CPNI training prior to receiving access to customers' CPNI call detail information.
4. Only job positions with business need to know are given access to CPNI call detail records.
5. Company has trained all personnel with access to CPNI as to the identification of CPNI when CPNI may be used and has an express disciplinary process in place for any improper use of CPNI.
6. No outbound sales and marketing campaigns are conducted without management approval and any such campaign would require supervisory review to assure compliance with the CPNI rules.