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DEC 01 2020
EXECUTIVE SECRETARY
G.P.S.C.

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

IN RE:	)	
	)	
IMPLEMENTATION OF SENATE BILL 147, THE "FAMILY VIOLENCE SHELTER CONFIDENTIALITY ACT OF 2004" (O.C.G.A § 46-5-7)	)	DOCKET NO. 19553-U

DATE: 1/1/2021

2021 PLAN FOR DOVETEL COMMUNICATIONS, LLC'S (d/b/a SYNCGLOBAL) PROTECTION OF CONFIDENTIALITY OF ADDRESSES AND LOCATIONS OF GEORGIA FAMILY VIOLENCE SHELTERS

COMES NOW DoveTel Communications, LLC ("DoveTel ") doing business as SyncGlobal Telecom hereby submits to the Georgia Public Service Commission (the "Commission") its Plan for Protection of Confidentiality of Addresses and Locations of Georgia Family Violence Shelters (the "Plan") pursuant to the Commission's Order of May 13, 2005 and in its Memorandum dated May 1, 2007 in the above-captioned matter.

A. Identification of Shelters

1. *Approved Family Violence Shelters.* DoveTel will utilize the Georgia Department of Human Resources' (the "Department") list of approved family violence shelters, located at http://gadfcs.org/familyviolence/, for the purpose of obtaining the identity of Department approved family violence shelters on a quarterly basis. A specific DoveTel employee will be responsible for obtaining the periodically updated list of approved family violence shelters on the designated date for updating the list. The list will then be distributed to DoveTel's personnel who will be responsible for checking the contents of the Department's list against DoveTel 's records to confirm that all of the current

approved family violence shelter accounts are properly marked and protected in DoveTel 's systems.

2. *Shelter Self-Identification*. In addition to utilizing the Department's list, DoveTel will implement procedures designed to elicit self-identification by shelters. Shelter self-identification may be accomplished at the time a service order is placed through a series of questions, asked of the customer by DoveTel 's customer service personnel, aimed at determining whether the customer requesting such new or additional services is a family violence shelter. The types of questions that might be asked include:

    a. What type of service does your business provide?

    b. Tell me how your business operates?

    c. If a non-profit organization, what type of organization?

    d. Is this a shelter?

    e. If a shelter, what type of shelter?

B. Special Handling of Shelter Customers

Once a customer has been identified as a family violence shelter (through either of the procedures described in sections A.1 and A.2 above), DoveTel will assign the customer to a specially trained, designated service representative. This representative will contact the customer to verify its status as a shelter. After a customer is verified as a family violence shelter, DoveTel will designate all the shelter's physical location information confidential and not for publication or dissemination. DoveTel will maintain such confidentiality by a process of coding the shelter's physical location information in its systems in a manner that suppresses and renders it inaccessible, except by the DoveTel employee(s) trained and authorized to have access to the

shelter's information. As such, the shelter's suppressed address/location information will not be available to directory publishing, directory assistance, operator services or account service personnel. However, the suppression procedures will not apply to the telephone numbers for shelters (*i.e.*, crisis line numbers) or the mailing address when different from the physical location address (*i.e.*, Post Office Box).

C. Directory Assistance

DoveTel will utilize a data designation in its systems that insures the suppression of the physical location information for all Department certified shelters, as well as for any shelters not listed on the Department's website (*i.e.*, uncertified shelters) and identified by DoveTel through the procedures described in section A.2 above. This will apply to all data made available for the purpose of providing directory assistance services. Accordingly, only the listed name and telephone number will be passed to the directory assistance database – no address details will be passed. In the event a customer requests the listing at a specific phone number, operators will be instructed to advise the customer that they have the listing name and number, but no address details are available.

To the extent DoveTel contracts with third parties for the provision of directory assistance services, DoveTel will notify such parties of the policies set forth in this Plan.

D. Directory Publishing

DoveTel 's address/location suppression protocol will apply to all data provided for the purpose of directory publication. As such, DoveTel will not provide directory publishers with the address/location information of Department certified shelters or uncertified shelters identified by DoveTel through the procedures described in section A.2 above.

DoveTel will check all new directory listings against the Department's list of certified shelters, as well as any uncertified shelters identified by DoveTel through the procedures described in section A.2 above, prior to electronic or paper directory preparation in order to ensure that a shelter's address/location information is not included in the published directory. On or just before directory ship date for both White and Yellow Page products, DoveTel will make a final comparison of the Department's list of certified shelters, as well as uncertified shelters, to the galley pages. If a discrepancy exists on the galley pages, DoveTel 's personnel will stop shipment of the directories and coordinate corrective measures with the affected shelter's designated representative.

To the extent DoveTel contracts with third parties for directory publication, DoveTel will notify such parties of the policies set forth in this Plan.

E. Business Office and Customer Contact Procedures

The data suppression procedures described above are designed to prevent unauthorized DoveTel personnel from accessing the physical location information for identified family violence shelters. However, in the event an employee in DoveTel 's business office, installation and repair, directory listing, operator services or other area of the company encounters a suppression designation, they will have been trained to immediately contact the DoveTel employee responsible for the implementation of the Plan (see section F below).

Shelter accounts will be suppressed from all outbound sales efforts, whether via telephone, direct mail, internet or otherwise. Without limitation, all such accounts will be suppressed from any customer list available for dissemination to any third party.

F. Plan Implementation

DoveTel will designate an employee(s) who will be responsible for the implementation of this Plan. Such employee(s) will be trained with respect to the confidentiality of information related to the physical location of certified family violence shelters.

G. Requirements upon Discovery of Disclosure

In the event DoveTel determines that the physical location of a family violence shelter has been revealed to an unauthorized person, DoveTel will immediately notify the following:

(1) The Georgia Commission on Family Violence by telephone within twenty-four (24) hours after such discovery.

(2) Provide written notice to the Commission no later than seven (7) days after such discovery; and

(3) Notify the shelter by telephone as soon as possible but no later than twenty-four (24) hours after such discovery.

Respectfully submitted this 1st day of January, 2021.

Kyle Williamson

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Jim Clotfelter
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ATTACHMENT A

AFFIDAVIT

GEORGIA

Haralson COUNTY

Personally, appeared before me, an officer duly authorized to administer oaths, Kyle P Williamson, who, after being duly sworn, deposes and says that he is the CEO of DoveTel Communications LLC. the Applicant, certified telephone service provider or directory information provider.

1.

I make this affidavit on the basis of my personal knowledge.

2.

I have read the May 15, 2005 Order (Attachment "A") and the August 30, 2005 Amendatory Order (Attachment "B") in Georgia Public Service Commission ("Commission") Docket No. 19553-U, Implementation of Senate Bill 147, the Family Violence Shelter Confidentiality Act of 2004 (O.C.G.A. § 46-5-7). I have also read the Commission Staff Memorandum dated May 1, 2007, (Attachment "C") that summarizes the requirements under O.C.G.A. § 46-5-7 and the Commission orders issued pursuant to that Code Section of providers of telephone service in the State of Georgia or any other entity that publishes, disseminates, or otherwise provides telephone directory information or listings of telephone subscribers in the State of Georgia.

3.

The Applicant agrees that it will satisfy the minimum requirements set forth in the Commission orders and Staff Memorandum referenced in paragraph 2 of this affidavit to

protect the confidentiality of the location and address of family violence shelters in the State of Georgia.

4.

Pursuant to O.C.G.A. § 46-5-7, the Applicant submits this affidavit as its plan to protect the confidentiality of the location and address of family violence shelters in the State of Georgia.

FURTHER AFFIANT SAITH NOT.

DoveTel Communications LLC,
d/b/a SyncGlobal

(COMPANY)

(SIGNATURE)

SUBSCRIBED AND SWORN BEFORE ME THIS 15th
DAY OF December, 2020.

(NOTARY PUBLIC)

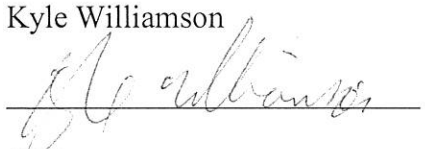
MICHELLE MARGARETTE MCLEROY
NOTARY PUBLIC
HARALSON COUNTY, GEORGIA
MY COMMISSION EXPIRES AUGUST 14, 2022

CERTIFICATE OF SERVICE

I hereby certify that I have served one original and three copies with request for one copy to be returned stamped "filed" in an enclosed self addressed stamped envelope of the foregoing filing, by depositing same in the United States mail in a properly addressed envelope with adequate postage thereon to insure delivery to the following parties:

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334-5701

Kyle Williamson



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