

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2019** covering the prior **calendar year 2018**

1. Date filed: **Jan 3 , 2019**
2. Name of company(s) covered by this certification: Telecom House, Inc.
3. Form 499 Filer ID: 824764
4. Name of signatory: Aaron Amid
5. Title of signatory: CEO
6. Certification:

I, Aaron Amid, 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 Commission's CPNI rules. *See 47 C.F.R. § 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, safeguards, recordkeeping, 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 customer complaints in the past year concerning the unauthorized release of CPNI

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.

Signed


Jan 3 2019

[Signature of an officer, as agent of the carrier]

Attachments: Accompanying Statement explaining CPNI procedures

Statement to Accompany Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36

Telecom House, Inc.; (“Telecom House” or “Company”) submits this accompanying statement to explain how Telecom House’s procedures ensure that the Telecom House is in compliance with the substantive requirements set forth in section 64.2001 *et seq.* of the Commission’s rules.

1. CPNI Defined and Described

CPNI is information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and, information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier.

CPNI includes Call Detail Records (“CDRs”), which contain information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any can.

CPNI does not include information that does not fall within the above definition. For example, CPNI does not include the subscriber’s name, telephone number *or* address.

2. CPNI Permitted Uses

Telecom House permits use, disclosure or access to CPNI, either directly or indirectly through its agent, to initiate, render, bill, and collect for its telecommunications services.

Telecom House permits use, disclosure or access to CPNI, either directly or indirectly through its agent, to protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

Telecom House permits use, disclosure or access to CPNI, either directly or indirectly through its agent, to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if such call was initiated by the customer and the customer approves of the use of such information to provide such service.

Telecom House permits use, disclosure or access to CPNI for purpose of providing carrier premise equipment (“CPE”) and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, protocol conversion and fur the provision of inside wiring, installation, maintenance, repair services.

3. CPNI Marketing Uses

Telecom House does not use, disclose or permit access to CPNI for the purpose of marketing services outside of the same category of service to which the customer already purchases from Telecom House. Telecom House does not share the CPNI of a customer with any affiliate or third party for the purpose of marketing any services.

In the event that the Company uses CPNI for sales or marketing campaigns that use CPNI, including any instances when CPNI is disclosed or provided to third parties or when third parties are allowed access to CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, what products and services were offered as part of the campaign. Such records will be retained for at least one year following the sales or marketing campaigns.

Telecom House maintains a supervisory review process regarding compliance with the rules for outbound marketing situations and maintains a record of compliance for a minimum of one year following the supervisory review. Sales personnel are required to obtain supervisory approval of any proposed outbound marketing request for customer approval.

4. CPNI Protections

Telecom House has information technology and personnel measures in place to discover and protect against attempts to gain unauthorized access to CPNI.

Telecom House does not provide CPNI over-the-phone to customers who contact the Company, unless the customer can identify the CPNI (e.g., time, date and the terminating telephone number of a call). In such instances, Telecom House will assist the customer only with regard to the CPNI identified and will not release any other CPNI over-the-phone to the customer.

Telecom House will disclose CPNI upon affirmative request by the customer to any person designated by the customer. A customer's request must be verified by management. Customers also may have Telecom House send CPNI to the customer's service/billing address of record or to an e-mail address that has been associated with the customer's account for at least thirty (30) days.

Telecom House does not have any on-line account access or retail locations at this time.

In the event an address of record is created or changed, Telecom House immediately provides notice to the customer at the pre-existing telephone number of record, service/billing address of record, or e-mail address of record. Such notice informs the customer as to the nature of the change, but does not reveal the changed information.

Personnel are trained as to when they are and are not authorized to use or disclose CPNI, and Telecom House has a disciplinary process in place for noncompliance. Remedies for non-compliance may include, but are not limited to, financial actions, legal actions, termination

and/or referrals to law enforcement when appropriate.

Telecom House has not experienced any CPNI breaches during the reporting year. However, Telecom House has in place procedures to detect breaches and to notify law enforcement and customers, in compliance with the Commission's rules, should a breach occur. Within seven (7) days of a reasonable determination of breach (i.e. CPNI disclosed to a third party without customer authorization), the Company will notify the US Secret Service ("USSS") and Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility www.fcc.gov/eb/cpni. After seven (7) days of USSS and FBI notice, if the Company has not received written direction from USSS or FBI, the Company will notify the customer of the breach, unless the USSS or FBI have extended the period for such notice. For two (2) years following USSS and FBI notice, the Company will maintain a record of (1) discovered breaches; (2) notifications to USSS and FBI; (3) USSS and FBI responses; (4) dates breaches discovered; (5) dates the Company notified USSS and FBI; (6) details of CPNI breached; and (7) circumstances of breaches.