

## **Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

### **EB Docket 06-36**

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

Date filed: February 7, 2019

Name of company(s) covered by this certification: IRU Networks, LLC

Form 499 Filer ID: 830220

Name of signatory: Donna Rice Costello

Title of signatory: Chief Financial Officer

#### **Certification:**

I, Donna Rice Costello, 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. S: 64.2001 et seq.

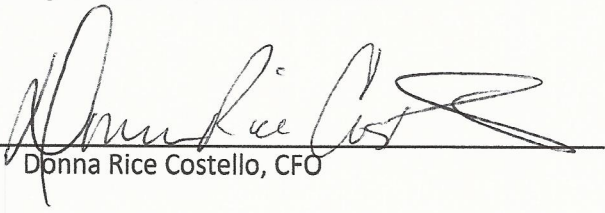
Attached to this certification is an accompanying statement explaining how IRU NETWORKS' procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

IRU NETWORKS 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.

IRU NETWORKS has not received customer complaints in the past year concerning the unauthorized release of CPNI.

IRU NETWORKS 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.

Signed: \_\_\_\_\_

  
Donna Rice Costello, CFO

Attachment: Accompanying Statement explaining CPNI procedures

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**Accompanying Statement explaining CPNI Procedures**

IRU Networks has implemented operating procedures and safeguards to ensure compliance with 47 C.F.R. § 64.2009(e).

Consistent with the Commission's rules, IRU Networks uses, discloses and permits access to CPNI obtained from its customers, either directly or indirectly through its agents; to initiate, render, bill and collect for telecommunications services, and 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.

IRU Networks does not disclose CPNI to third parties except as necessary in its provision of the telecommunications service requested by the customer, upon affirmative written or oral request by the customer or to any person designated by the customer or as otherwise permitted by law.

If oral authorization is used for any inbound or outbound customer telephone contacts, such CPNI authority, if granted, only lasts for the duration of that call.

CPNI is not used in any outbound telemarketing or email campaigns.

Procedures are in place to notify customers if CPNI is going to be used or otherwise disclosed, and there is a process in place to allow individual customers to "opt out" of this use.

Procedures are in place to authenticate the identity of callers before any CPNI is discussed.

Training is provided on appropriate use of CPNI and the related procedures in place to ensure compliance, and any disciplinary action due to violation of CPNI procedures.