

## **Pin Yin Communications, LLC**

### **Statement of CPNI Procedures and Compliance**

Pin Yin Communications, LLC ("Pin Yin Communications") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, Pin Yin Communications does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. Pin Yin Communications does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The company provides service only to other carriers. Pin Yin Communications typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service.

Pin Yin Communications may obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because Pin Yin Communications provides exclusively carrier-to-carrier services, it does not use any call detail information that it obtains in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers.

Moreover, the call detail information obtained by Pin Yin Communications is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

Pin Yin Communications safeguards from improper use or disclosure by employees the call detail information that Pin Yin Communications obtains in providing its carrier-to-carrier services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, Pin Yin Communications has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to Pin Yin Communications computers and call detail records. In the event of unauthorized CPNI access, Pin Yin Communications will notify the requisite law enforcement agencies, and the customer when possible.

Pin Yin Communications did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because Pin Yin Communications does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through Pin Yin Communications, it cannot notify those end-user customers directly if a breach occurs. However, Pin Yin Communications has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than information that has been publicly reported, regarding the processes that pretexters or data brokers are using to attempt to access CPNI.



**Pin Yin Communications, LLC**

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

COMPANY NAME: Pin Yin Communications, LLC

REPORTING PERIOD: January 1, 2018 - December 31, 2018

FILER ID: 827747

OFFICER: Robert Hetherington

TITLE: President

I, Robert Hetherington, hereby certify that I am an officer of Pin Yin Communications, LLC ("Pin Yin Communications") and that I am authorized to make this certification on behalf of Pin Yin Communications. I have personal knowledge that Pin Yin Communications has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Pin Yin Communications or to any of the information obtained by Pin Yin Communications. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Pin Yin Communications employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Pin Yin Communications or to the information obtained by Pin Yin Communications.

Signed: 

On behalf of Pin Yin Communications, LLC

Date: 2/11/19