

IT Freedom

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

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

DATE FILED: February 13, 2018

NAME OF COMPANY COVERED BY THIS CERTIFICATION: IT Freedom, Inc.

FORM 499 FILER ID: 827626

NAME OF SIGNATORY: Jeffrey Taff

TITLE OF SIGNATORY: President/CEO


I, Jeffrey Taff, 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, 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: 
On behalf of IT Freedom, Inc.

Attachments: Accompanying CPNI Policy Statement

CUSTOMER PROPRIETARY NETWORK INFORMATION POLICY STATEMENT

Pursuant to Section 222 of the Communications Act and the Federal Communications Commission's ("FCC") CPNI Rules (47 C.F.R. Section 64.2001, et seq.), IT Freedom, Inc. ("IT Freedom") files this Policy Statement outlining the Company's procedures relating to the storage, access and use of Customer Proprietary Network Information ("CPNI").

IT Freedom provides telecommunications services to retail customers. Because IT Freedom may store, access, or use CPNI during the course of providing these services, the Company has taken the measures outlined in this Policy Statement to protect CPNI from unauthorized access or misuse.

Use of CPNI

It is the policy of IT Freedom not to use CPNI for any activity not allowed by applicable law. Any disclosure of CPNI to other parties occurs only if the Company determines the disclosure is necessary to conduct a legitimate business activity related to the services currently provided to the customer by the Company. Prior to using or sharing CPNI, IT Freedom will obtain the customer's consent (except where IT Freedom is required by law to disclose CPNI or when the intended use is permitted by FCC Rules).

Disclosure of CPNI

IT Freedom does not disclose CPNI outside of the company or its agents without customer consent.

IT Freedom permits the release of CPNI based upon a customer-initiated telephone call only under the following four (4) circumstances:

- When the information requested is to be sent to the customer's dedicated account representative at the customer's physical or email address of record;
- When the information requested is to be sent to a party designated by express written grant of permission from the customer's dedicated account representative at that party's physical or email address of record;
- When the information requested by the customer is discussed with the customer's dedicated account representative possessing valid identification, at the Company's offices; or
- When IT Freedom calls the customer's telephone number of record and discusses the information with the customer's dedicated account representative.

Online Access to CPNI

IT Freedom does not grant on-demand online access to CPNI.

If IT Freedom decides to grant on-demand online access to CPNI, the Company will authenticate customers without using easily obtainable biographical or account information before allowing the customer online access to CPNI. Authenticated customers will then only be able to obtain online access to CPNI using a password that is not prompted by the Company requesting easily obtainable biographical or account information.

Password Authentication Procedures

If IT Freedom decides to grant on-demand online access to CPNI, IT Freedom will authenticate customers' identities without using easily obtainable biographical or account information. The Company may create a backup customer identification method in the event that a customer is unable to provide a password, but such backup customer identification methods will not depend on easily obtainable biographical or account information. If a customer cannot provide the correct password or the correct response to the backup identification method the customer must establish a new password.

Account Change Notification

IT Freedom immediately notifies customers of any account changes including address of record, authentication, online account and password related changes.

Employee Training Policies and Disciplinary Procedures

All employees of IT Freedom are trained as to when they are, and are not, authorized to use CPNI. Through this training, IT Freedom has informed its employees and agents that the Company considers compliance with the Communications Act and FCC Rules concerning the use and disclosure of, and access to, CPNI to be extremely important.

Violation of CPNI requirements by company employees or agents will lead to disciplinary action (including corrective action and termination), depending on the circumstances of the violation.

Use of CPNI in Sales and Marketing Campaigns

If IT Freedom uses CPNI in marketing campaigns, the Company will maintain a record of all such campaigns. Records will include a description of the campaign, the specific CPNI used in the campaign, and what products and services were offered as part of the campaign.

If IT Freedom uses CPNI in marketing campaigns, the Company will also implement a system to obtain prior approval and informed consent from its customers in accordance with the CPNI Rules. This system will allow for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.

Before starting a sales or marketing campaign utilizing CPNI, IT Freedom will establish the status of a customer's CPNI approval. The following sets forth the procedure to be followed by the Company:

- Prior to any solicitation for customer approval, IT Freedom will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
- IT Freedom will use opt-in approval for any instance in which the Company must obtain customer approval prior to using, disclosing, or permitting access to CPNI.
- A customer's approval or disapproval remains in effect until revoked or limited by the customer.
- Records of approvals are maintained for at least one (1) year.
- IT Freedom will provide individual notice to customers when soliciting approval to use, disclose or permit access to CPNI.
- The CPNI notices sent by IT Freedom comply with FCC Rule 64.2008(c).

If IT Freedom uses CPNI in marketing campaigns, the Company will also establish a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one (1) year.

FCC Notification

IT Freedom is prepared to provide written notice to the FCC within five (5) business days of any instance where opt-in mechanisms do not function correctly or to a degree that customers' inability to opt-in is more than an anomaly.

Third Party Use of CPNI

Prior to allowing joint venturers or independent contractors access to customers' individually identifiable CPNI, IT Freedom will require such third parties to enter into a confidentiality agreement ensuring compliance with this Policy Statement. IT Freedom will also obtain opt-in consent from a customer prior to disclosing the information to such third parties for marketing purposes. IT Freedom will also require all outside agents to acknowledge and certify that they may only use CNPI for the purpose for which it is provided.

IT Freedom requires express written authorization from the customer prior to providing CPNI to new carriers, except as otherwise required by law.

IT Freedom does not market or sell CPNI to any third party.

Law Enforcement Notification of Unauthorized Disclosure

If an unauthorized disclosure of CPNI takes place, IT Freedom will provide notification of the breach to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") within seven (7) days.

The Company will wait an additional seven (7) days after notifying the USSS and FBI before notifying affected customers of the breach.

Notwithstanding the above, if IT Freedom determines there is an immediate risk of irreparable harm to customers the Company shall not wait the additional seven (7) days to notify those customers.

IT Freedom will maintain records of discovered breaches of CPNI for a period of at least two (2) years.

Customer Complaints

In the past year, IT Freedom has not received any complaints from customers concerning the unauthorized release of or access to CPNI.

Contact Information

Individuals or entities with questions about this CPNI Certification or the use of CPNI by IT Freedom may contact the company's CPNI Compliance Officer at (512) 419-0070.

Actions Taken Against Pretexters

In the past year IT Freedom has not taken any actions against data brokers before state commissions, state or federal courts, or the FCC. IT Freedom has no information, other than that publicly reported, concerning the processes that pretexters are using to attempt to access CPNI.

Annual CPNI Certification

In accordance with FCC regulations, 47 C.F.R. § 64.20089(e), IT Freedom will annually submit to the FCC, prior to March 1st, a CPNI Certification of Compliance and accompanying Statement regarding the company's CPNI policies and operating procedures. These documents certify that IT Freedom complied with federal laws and FCC regulations concerning the protection of CPNI throughout the prior calendar year.