

Annual 47 CFR § 64.2009(e)

CPNI Certification Template

EB Docket 06-36

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

1. Name of company(s) covered by this certification: Expereo USA, Inc.

2. Form 499 Filer ID: 828596

3. Name of signatory: Marieke Thuis

4. Title of signatory: General Counsel

5. Certification:

I, Marieke Thuis, 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 CFR § 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 CFR § 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: _____



Marieke Thuis, General Counsel for Expereo USA, Inc.

Date: _____

14-2-2018

Expereo USA, Inc.

Statement of CPNI Procedures and Compliance

Expereo USA, Inc. ("Expereo") is the leading aggregator of "last mile" global internet connectivity services. Specifically, Expereo provides broadband Internet, Ethernet, Virtual Private Networks (management) services, equipment installation and on-site professional services to international carriers, cloud providers and integrators in the United States and around the world.

Expereo provides services exclusively to enterprise customers. Expereo does not offer or market any of its services to the residential users, or to such classes of users as to be effectively available directly to the residential users. Further, Expereo does not provide a telecommunications service or an interconnected VoIP service to any of its customers.

Based on this, Expereo has very limited access to information that would qualify as CPNI. The company has no access to any information comprising Call Detail Records ("CDRs") or information about any calls traversing its networks, or supplier networks.

To the extent any end-user information is available to Expereo, this information is not made available to any third parties without proper authorization.

With respect to the use, disclosure, and access to information that may qualify as CPNI, all Expereo employees, contractors, suppliers, and consultants employed or engaged by the company are required to sign, as a condition of employment or engagement, statements of confidentiality and non-disclosure. Expereo engages in routine, mandatory training sessions with all employees to ensure confidentiality of customer data. Expereo has adopted policies to police unauthorized disclosure, and may subject employees to disciplinary action, up to termination, for a breach of these policies.

Moreover, any confidential information that may qualify as CPNI obtained by Expereo is not made available to end-user customers or third parties without proper authentication. 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.

CPNI In Marketing Campaigns

Expereo currently does not use any information that may qualify as CPNI in marketing campaigns.

Should Expereo use CPNI in marketing campaigns, the company attests that it will maintain a record of its and its affiliates' sales and marketing campaigns that use customers' CPNI. Expereo will also maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.

Expereo will also establish a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintain records of disclosure.

Safeguarding of CPNI

Expereo has enacted the following protocols to ensure CPNI is kept safe from unauthorized disclosure.

Expereo trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and has adopted an express disciplinary process in place if the rules are violated.

To the extent Expereo uses, retains, or accesses CPNI, Expereo has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

Expereo also authenticates the identity of a customer prior to disclosing CPNI based on authentication procedures prescribed under the FCC's CPNI rules.

Expereo maintains records of our compliance with the FCC's CPNI Rules for use of CPNI in outbound marketing efforts, for at least one year.

Expereo is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Expereo is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. Expereo may also notify the customer of such breach, after consulting with the investigatory agency(ies), if the company believes there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. The company will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Expereo will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.