

## **Callcentric, Inc.**

### **STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION**

Set forth below is a statement summarizing the CPNI policies and procedures of Callcentric, Inc. ("Callcentric") which ensure adequate compliance with the Federal Communications Commission's ("FCC") CPNI regulations. Callcentric provides non-interconnected VoIP services exclusively.

As a non-interconnected VoIP, the company does not provide regulated telecommunications services subject to the FCC's CPNI regulations. Nevertheless, Callcentric has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI and, furthermore, the company has informed its employees of the company's CPNI compliance policy.

Callcentric does not maintain CPNI in any manner which would give rise to the unauthorized disclosure of confidential information. Even in cases dealing with the limited information which is necessary to facilitate non-interconnected VoIP services, Callcentric takes steps prior to providing any requested information to assure itself that the individual making the request is authorized to obtain it.

To the extent CPNI exists, it is maintained by Callcentric in a secure location which is not accessible by company employees without going through the company's established security procedures. Confidential customer information may however 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. In the event of unauthorized CPNI access, Callcentric will notify the requisite law enforcement agencies, and the customer when possible.

Callcentric did not have any breach of its customer 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. Callcentric 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 publicly reported information regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

**Callcentric, Inc.**

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

COMPANY NAME: Callcentric, Inc.

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

FILER ID: 829117


OFFICER: Gregory Borodiansky

TITLE: CTO

I, Gregory Borodiansky, hereby certify that I am an officer of Callcentric, Inc. ("Callcentric") and that I am authorized to make this certification on behalf of Callcentric. I have personal knowledge that Callcentric 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 Callcentric.

Attached to this certification is an accompanying statement explaining the procedures Callcentric employs to ensure that it complies with Federal Communication Commission's ("FCC") CPNI requirements.

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



On behalf of Callcentric, Inc.

Date: Feb. 19, 2019