

VividTalk Wireless

Statement of CPNI Procedures and Compliance

VividTalk Wireless, LLC. ("VividTalk Wireless") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, VividTalk Wireless does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. VividTalk Wireless 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. VividTalk Wireless 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.

VividTalk Wireless may obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because VividTalk Wireless 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 VividTalk Wireless 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.

VividTalk Wireless safeguards from improper use or disclosure by employees the call detail information that VividTalk Wireless 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, VividTalk Wireless has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to VividTalk Wireless computers and call detail records. In the event of unauthorized CPNI access, VividTalk Wireless will notify the requisite law enforcement agencies, and the customer when possible.

VividTalk Wireless 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 VividTalk Wireless does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through VividTalk Wireless, it cannot notify those end-user customers directly if a breach occurs. However, VividTalk Wireless 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.

VividTalk Wireless, LLC

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

COMPANY NAME: VividTalk Wireless, LLC
REPORTING PERIOD: January 1, 2018 - December 31, 2018
FILER ID: 832612
OFFICER: Ricardo Canal
TITLE: CEO

I, Ricardo Canal, hereby certify that I am an officer of VividTalk Wireless, Inc. ("VividTalk Wireless") and that I am authorized to make this certification on behalf of VividTalk Wireless. I have personal knowledge that VividTalk Wireless 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 VividTalk Wireless or to any of the information obtained by VividTalk Wireless. See 47 C.F.R. 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures VividTalk Wireless 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 VividTalk Wireless or to the information obtained by VividTalk Wireless.

Signed: 
On behalf of VividTalk Wireless, Inc.

Date: 2/15/19