



IDT Telecom, Inc.  
520 Broad Street  
Newark, New Jersey 07102

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018

Date filed: February 21, 2019

Name of company(s) covered by this certification: IDT Telecom, Inc.

Form 499 Filer ID: 826339

Name of signatory: Bill Pereira

Title of signatory: Executive Vice President

I, Bill Pereira, 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 (see attached accompanying statement.)

The Company has not taken any actions (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 any 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 

REVIEWED  
BY  
LEGAL DEPT.  
Date Initial  
2/20/19 CB

**STATEMENT REGARDING OPERATING PROCEDURES  
IMPLEMENTING 47 C.F.R. SUBPART U  
GOVERNING USE OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

IDT Telecom, Inc., its subsidiaries and affiliates<sup>1</sup> ("Company" or "IDT") is committed to protecting the privacy of its customers' confidential and proprietary information and has established operating procedures to protect CPNI. The following statement explains the operating procedures of IDT to ensure that it is in compliance with the CPNI rules of the Federal Communications Commission's ("Commission" or "FCC").

**Use of CPNI**

1. The Company uses CPNI for the purpose of providing a customer with the requested service. The Company also uses CPNI for various purposes permitted by law. Specifically, the Company may use, disclose or permit access to CPNI to initiate, render, bill, and collect for its telecommunications and Voice-over-Internet Protocol ("VoIP") services. The Company may also use, disclose or permit access to CPNI to protect the rights or property of the Company, or to protect users of those services and other service providers from fraudulent, abusive, or unlawful use of, or subscription to, such services. The Company may use, disclose or permit access to CPNI to provide inbound telemarketing, referral, or administrative services to the subscriber for the duration of the call, if such call is initiated by the subscriber and the subscriber approves of the use of such CPNI to provide such service. The Company may use, disclose or permit access to CPNI to provide call location information concerning the user of a commercial mobile service. The Company may use, disclose or permit access to CPNI for the purpose of providing carrier premise equipment ("CPE") and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, protocol conversion, provision of inside wiring, installation, maintenance, repair services, and to market services formerly known as adjunct services, such as, but not limited to, speed dialing, computer provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding and certain Centrex features.

2. The Company uses CPNI for the purpose of marketing service offerings among the categories of service to which the customer already subscribes from IDT. The Company does not use, disclose, or permit access to CPNI to market service offerings that are within a category of service to which the subscriber does not already subscribe from IDT, unless the Company obtains proper customer approval in accordance with Commission rules and regulations.

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<sup>1</sup> IDT Telecom, Inc.; IDT Corporation; IDT Telecom, LLC; Entrix Telecom, Inc.; Net2Phone Cable Telephony, LLC; Net2Phone Global Services, LLC; IDT America, Corp.; and IDT Domestic Telecom, Inc.

### **Protection of CPNI**

3. The Company does not provide Call Detail Record ("CDR") information over the telephone to customers who contact the Company, unless the customer provides a valid password. In order to establish a password, the Company authenticates the customer without reliance on readily available biographical information or account information. If a customer properly identifies a call, the Company may assist the customer with regard to that call and will not release any other CDR information. The Company provides access to non-CDR information over the telephone to customers who contact the Company after the customer has provided certain information to the Company representative to verify the identity of the customer. The type of information required for access to non-CDR information differs depending on the type of service subscribed to by the customer.

4. The Company does not provide access to CPNI online unless the customer provides a valid password. In order to establish a password, the Company authenticates the customer without reliance on readily available biographical information or account information. If a Customer forgets the password, the customer may contact IDT Customer Service, which will authenticate the customer without reliance on readily available biographical information or account information, or the Company may supply the password to the postal or electronic address that the Company has associated with the customer's account for at least 30 days.

5. The Company does not provide access to CPNI information at retail locations where its services are sold.

### **Law Enforcement and Required Disclosures**

6. The Company notifies a customer of certain account changes, including when a password, customer response to a security question means of authentication, or Address of Record is created or changed. The notification is sent by electronic mail to the Address of Record or by postal mail to the Address of Record, as to reasonably ensure that the customer receives the notification. The notification does not provide the updated information.

7. The Company will disclose CPNI upon affirmative written request by a customer to any person designated by the customer. The Company verifies all affirmative written customer requests.

8. Within 7 days of a reasonable determination of breach (*i.e.*, CPNI disclosed to a third party without customer authorization), the Company will notify the US Secret Service ("USSS") and Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility [www.fcc.gov/eb/cpni](http://www.fcc.gov/eb/cpni).

- After 7 days of USSS and FBI notice, if IDT has not received written direction from USSS or FBI, IDT will notify the customer of the breach, unless the USSS and FBI have extend the period for such notice.
- For 2 years following USSS and FBI notice, IDT will maintain a record of (1) discovered breaches; (2) notifications to USSS and FBI; (3) USSS and FBI responses; (4) dates breaches discovered; (5) dates INS notified USSS and FBI; (6) details of CPNI breached; and (7) circumstances of breaches.

### **Training, Recordkeeping and Enforcement**

9. The Company employees are trained as to the proper protection, uses and treatment of CPNI, including familiarity with the Company's internal CPNI policies and procedures.

10. The Company maintains a record of sales and marketing campaigns that use CPNI, including any instances when CPNI is disclosed or provided to third parties or when third parties are allowed access to CPNI. The record is required to include a description of each campaign, the specific CPNI that was used in the campaign, what products and services were offered as part of the campaign. Such records are required to be retained for at least 1 year following the sales and marketing campaign.

11. The Company maintains a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and maintains records of compliance for a minimum of 1 year following the supervisory review. Sales personnel are required to obtain supervisory approval of any proposed outbound marketing request for customer approval.

12. The Company employs appropriate remedies against those persons violating the Company's internal CPNI policies and procedures. Remedies may include, but are not limited to, financial, legal or disciplinary actions including termination and referrals to law enforcement when appropriate.