

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering calendar year 2018

Date filed: February 22, 2019

Name of companies covered by this certification:

Talkie Communications, Inc.

830693

Name of signatory: Andre DeMattia

Title of signatory: CEO / COO

I, Andre DeMattia, 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, consisting of the CPNI Compliance Policies and Operating Procedures of Talkie Communications, Inc. that describes the steps taken to protect CPNI and explains how the companies' procedures ensure that they are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions 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.

Signed   
\_\_\_\_\_  
Andre DeMattia  
CEO / COO  
Talkie Communications, Inc.

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**Attachments:** Accompanying statement explaining CPNI procedures.

## **Talkie Communications, Inc.**

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

Set forth below is a statement summarizing the policies and procedures of Talkie Communications, Inc. ("Talkie") which ensure adequate compliance with the Federal Communications Commission's ("FCC") CPNI regulations. See 47 C.F.R. § 64.2001 et seq. Talkie provides telecommunications services exclusively as a private service provider and wholesale supplier to the prepaid calling services industry.

As a wholesale prepaid services provider, the company does not have access to CPNI. Prepaid services customers do not "subscribe" to the services of Talkie in the same manner as customers of non-prepaid service providers; rather, these customers decide for themselves if they will use the company's services. These customers do not receive bills from Talkie. Talkie does not have information concerning the quantity, technical configuration, type, destination, location, or amount of use of telecommunications services which can be associated with any individual customer. Indeed, because the company's prepaid services may lawfully be utilized by any authorized user of the purchased services, Talkie has no means of identifying the particular individual which has placed any particular call.

Nevertheless, Talkie 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. Talkie does not release or distribute CPNI to unauthorized individuals; neither does Talkie use CPNI in violation of § 64.200 § et seq. of the FCC's Rules.

To the extent Call Detail Records ("CDRs") exist, they are not associated with any individually identifiable customer and do not constitute CPNI. To the extent that such CDR information exists in paper, removable magnetic or optical form, it is maintained by Talkie in a secure location which is not accessible by employees of Talkie without going through the company's established security procedures. When such information is maintained on a computer, the computer and/or the individual file is password protected.

As noted above, Talkie 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 customer purchases of prepaid telecommunications services, Talkie takes steps prior to providing any requested information to assure itself that the individual making the request is authorized to obtain it.

Moreover, any call detail information obtained by Talkie 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. In the event of unauthorized CPNI access, Talkie will notify the requisite law enforcement agencies, and the customer when possible.

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