

Annual 47 CFR §64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year ending December 31, 2018.

1. Date filed: March 1, 2019
2. Name of company covered by this certification: BroadSoft Adaption, Inc.
3. Form 499 Filer ID: 829410
4. Name of Signatory: Chad Breckinridge
5. Title of Signatory: Vice President and Assistant Secretary
6. Certification:

I, Chad Breckinridge, 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, safeguards, recordkeeping and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company **has not** taken any 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 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: /s/ Chad Breckinridge

Attachments: Accompanying Statement explaining CPNI procedures

Accompanying Statement to Annual CPNI Compliance Certification

BroadSoft Adaption, Inc.

In compliance with 47 C.F.R. § 64.2009(e), I, Chad Breckinridge, acting on behalf of BroadSoft Adaption, Inc. (the “Company”) and solely in my capacity as Vice President and Assistant Secretary of the Company and not in any individual capacity, hereby certify that the Company has taken the following actions:

Employee Training and Discipline

- Trained all employees and personnel as to when they are and are not authorized to use CPNI.
- Instituted an express disciplinary process for unauthorized use of CPNI.
- The Company considers CPNI to be Company confidential information and treats it as such, to the extent Company rules regarding confidential information meet or exceed its obligations under the CPNI rules.

Sales and Marketing campaigns

- Management approves all sales and marketing campaigns, to the extent CPNI is utilized.

Record-Keeping Requirements

- Established a system to maintain a record of all sales and marketing campaigns that use their customers' CPNI, including marketing campaigns of affiliates and independent contractors.
- Ensured that these records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. The Company had no marketing or sales partnerships that require use of CPNI in the previous year.
- Made certain that these records are maintained for a minimum of one (1) year.

Opt-In

- The Company's default status is that a customer must opt in before the Company uses his or her CPNI, where the CPNI rules require consent.
- CPNI that is entered online by either the Customer or an authorized agent on behalf of the customer is password protected and some items encrypted.

Customer Authentication Methods

- Instituted customer authentication methods to ensure adequate protection of customers' CPNI. It is only available online to the customer and Company account

maintenance functions who must first present a valid account name and password. The password is one of their choosing when their account access credentials are established and the customer may change this at any time. Access logs are maintained for at least one year.

Customer Notification of CPNI Changes

- Changes to the Customers' account access information; mailing address, email address or contact information will generate a confirmation email that is sent to the original address of record.

Notification to Law Enforcement and Customers of Unauthorized Access

- Established a protocol under which the appropriate Law Enforcement Agency ("LEA") and customers are notified of any unauthorized access to a customer's CPNI, in compliance with 47 C.F.R. § 64.2009(e). No actions were taken against databrokers within the last year.
- Ensured that all records of any discovered CPNI breaches are kept for a minimum of 2 years.

Summary of Customer Complaints regarding CPNI

In compliance with 47 C.F.R. § 64.2009(e), set forth below is a summary of customer complaints received within the reporting year:

1. The Company has received no complaints as a result of improper access by employees.
2. The Company has received no complaints as a result of improper disclosure to individuals not authorized to receive the information.
3. The Company has received no complaints as a result of instances of improper access to online information by individuals not authorized to view the information.
4. In addition, the Company is aware of no processes pretexters are using to attempt to access CPNI, or what steps other carriers are taking to protect CPNI.