

Annual 47 CFR § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Acrobat Communications, Inc. covering calendar year 2017

1. Date filed: 02/25/2018
2. Name of company(s) covered by this certification: Acrobat Communications, Inc.
3. Form 499 Filer ID: 826577
4. Name of signatory: Constantin Barbulescu
5. Title of signatory: CEO
6. Certification:

I, Constantin Barbulescu, 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 CFR § 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 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 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 CFR § 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  [Signature of an officer, as agent of the carrier]

Attachment: Accompanying Statement explaining CPNI procedures

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

Acrobat Communications, Inc. (Acrobat) has established policies and procedures to assure compliance with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Information ("CPNI") § 64.2001et. seq. of the Commission's rules.

I. Use Of CPNI Without Customer Approval

A. Acrobat may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already subscribes from Acrobat, without customer approval. Acrobat does not share customer CPNI with any affiliates, joint venture partners, or contractors.

B. Acrobat does not use, disclose, or permit access to CPNI to market to a customer service offerings that are within a category of service to which the subscriber does not already subscribe from Acrobat, without customer approval as described in Section I.C

1. Acrobat may use, disclose, or permit access to CPNI derived from the provision of interexchange service, without customer approval for the provision of CPE and information service(s)

2. Acrobat may not and does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers. For example Acrobat cannot use interexchange CPNI to track all customer that call long distance competitors.

C. Acrobat may use, disclose, or permit access to CPNI without customer approval, as follows:

1. Acrobat may use, disclose, or permit access to CPNI in its provision of inside wiring, maintenance, and repair services

2. Acrobat may use, disclose, or permit access to CPNI for the purpose of conducting research on the health effects of CMRS

3. Acrobat may use CPNI to market services formerly known as adjunct to-basic 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 I.D., call forwarding, and certain centrex features.

D. Acrobat may use, disclose, or permit access to CPNI to protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

II. Approval Required For Use Of CPNI Acrobat does not obtain approvals for use of CPNI because Acrobat does not use or disclose customer CPNI in any manner that requires customer approval. Acrobat's operating procedures generally prohibit the disclosure of CPNI for the purpose of marketing communications-related services to existing customers by its agents, joint venture partners, and independent contractors.

III. Notice Required For Use Of CPNI Acrobat does not use customer CPNI for any purposes which currently require customer approval. In the event that at a future time Acrobat wishes to use customer CPNI in a manner that requires customer approval, it will do so in accordance with the approval and notice requirements specified in Sections 47 CFR 64.2007 - 64.2008 of the Commission's rules.

IV. Safeguards On The Disclosure Of Customer Proprietary Network Information. Acrobat has procedures in place to assure that customers are properly authenticated prior to disclosing CPNI. Acrobat authenticates a customer prior to disclosing CPNI as follows:

(a) In person – the customer must be personally known by the employee or the customer must provide a valid photo ID matching the customer's account information.

(b) Telephone access to CPNI. Acrobat will only disclose call detail information over the telephone, based on customer-initiated telephone contact, if the customer first provides Acrobat with a password, as described in paragraph (d) below that is not prompted by the carrier asking for readily available biographical information, or account information. If the customer does not provide a password, Acrobat will only disclose call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record. If the customer is able to provide call detail information to Acrobat during a customer-initiated call without Acrobat's assistance, then Acrobat may discuss the call detail information provided by the customer.

(c) Online access to CPNI. Acrobat will authenticate a customer without the use of readily available biographical information, or account information, prior to allowing the customer online access to CPNI related to a telecommunications service account. Once authenticated, the customer may only obtain online access to CPNI related to a telecommunications service account through a password that is not prompted by Acrobat asking for readily available biographical information, or account information.

(d) Establishment of a Password and Back-up Authentication Methods for Lost or Forgotten Passwords. To establish a password, Acrobat authenticates the customer without the use of readily available biographical information, or account information. Acrobat may create a back-up customer authentication method in the event of a lost or forgotten password, but such back-up customer authentication method may not prompt the customer for readily available biographical information, or account information. If a customer cannot provide the correct password or the correct response for the back-up customer authentication method, the customer must establish a new password as described in this paragraph.

(e) Notification of account changes. Acrobat promptly notifies customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed. This notification may be through a voicemail

or text message sent by Acrobat to the telephone number of record, or by mail to the address of record, and will not reveal the changed information or be sent to the new account information.

(f) Business customers Acrobat and its business customers address issues of CPNI protection specifically in their contracts. Acrobat's business customers each have a dedicated account representative.

V. Notification of Customer Proprietary Network Information Security Breaches. – In the case of a breach, Acrobat will as soon as practicable, and in no event later than seven (7) business days, after reasonable determination of the breach, electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) through the FCC link at <http://www.fcc.gov/eb/cpni>.

(a) Notify customers only after 7 full business days have passed after notification to the USSS and the FBI unless the USSS or FBI has requested an extension.

(b) If there is an extraordinarily urgent need to notify affected customers or the public sooner in order to avoid immediate and irreparable harm, it will be done only after consultation with the relevant investigating agency. Acrobat shall cooperate with the relevant investigating agency's request to minimize any adverse effects of such customer notification.

(c) Maintain a record of any breaches discovered, notifications made to the USSS and the FBI and notifications made to customers. The record will include if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Acrobat shall retain the record for a minimum of 2 years.

(d) Include a summary of the breach in the annual compliance certificate filed with the FCC.

VI. Record Retention

Acrobat retains all required information regarding CPNI. Following are the minimum retention periods Acrobat has established:

- CPNI notification and records of approval if used – five years
- Marketing campaign if used – one year
- Breaches: five years
- Annual Certification – five years
- Employee training certification – five years
- All other information – two years.