

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:

IntelePeer Cloud Communications LLC

830207

Name of signatory: Kristin Manwarren

Title of signatory: SVP, Legal Affairs

I, Kristin Manwarren, 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 IntelePeer Cloud Communications LLC 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



Kristin Manwarren
SVP, Legal Affairs
IntelePeer Cloud Communications LLC

Attachments: Accompanying statement explaining CPNI procedures.

CERTIFICATION OF CPNI FILING March 1, 2019 EB Docket No. 06-36
Statement of CPNI Procedures and Compliance

IntelPeer Cloud Communications LLC ("IntelPeer" or the "Company") does not use or permit access to CPNI to market any services outside of the "total services approach" as specified in 47 CFR §64.2005. Nor does the Company allow affiliates or third parties access to CPNI for marketing-related purposes. If IntelPeer elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR §64.2001 et seq., including the institution of operational procedures to ensure that the appropriate notification is provided and customer approval is obtained before CPNI is used or disclosed. IntelPeer will develop and implement an appropriate tracking method to ensure that customers' CPNI approval status can be verified prior to using CPNI for marketing-related purposes. The Company will also adopt the requisite recordkeeping requirements should it use CPNI in the future for marketing-related purposes.

Consistent with the Commission's rules, IntelPeer uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of IntelPeer, other users, and other carriers from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services to the customer that are within the same class of services to which the customer already subscribes.

IntelPeer does not currently market to customers that call and make inquiries concerning their account information. But should the Company choose to do so in the future, it will obtain a customer's oral authorization. IntelPeer will also require each of its representatives to provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

In order to authenticate a customer's identity prior to disclosing CPNI, IntelPeer authenticates the customer using a variety of methods. IntelPeer has implemented procedures to allow customers to change their account information in a manner that conforms with the relevant rules. IntelPeer has implemented procedures whereby it will not provide CPNI without proper customer authentication and does not provide call detail records over the phone. Call detail records are exclusively provided electronically on secure on-line sites or via electronic mail to the electronic address of record. IntelPeer has also implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, IntelPeer will notify affected customers. IntelPeer will maintain a record of any CPNI-related breaches for a period of at least two years.

All IntelPeer employees who have access to CPNI receive annual training about CPNI compliance. Specifically, a summary of IntelPeer's CPNI policies are included in the Company Policies available on the intranet site. All IntelPeer employees are required to maintain the confidentiality of all confidential information, including customer information, that is obtained as a result of their employment by IntelPeer. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, up to and including termination.