

Annual CPNI Certification 47 C.F.R. § 64.2009(e)
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: 02/26/2018
2. Name of company(s) covered by this certification: VOIPO LLC
3. Form 499 Filer ID: 828086
4. Name of signatory: Timothy Dick
5. Title of signatory: Owner/CEO
6. Certification:

I, Timothy Dick, 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.

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 the Commission's rules.

The company has not taken actions 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 _____

Timothy Dick, CEO

Accompanying Statement to Annual 64.2009(e) CPNI Certification for VOIPO LLC

The policy of VOIPO LLC. (hereinafter “VOIPO” or “company”) is to protect the confidentiality of CPNI, as required by section 222 of the Telecommunications Act of 1996, and the FCC’s rules promulgated thereunder.

VOIPO has established operating procedures to ensure compliance with the Commission’s rules governing the protection of CPNI. Specifically, VOIPO has adopted a CPNI Compliance Manual, which is distributed to each employee within VOIPO who either has, or may have, access to CPNI. The key provisions of VOIPO’s operating procedures and practices with respect to CPNI are set forth below.

Use of CPNI

- VOIPO does not use, disclose, or permit access to CPNI without customer consent, except as permitted by 47 U.S.C. § 222 and 47 C.F.R. § 64.2005.
- VOIPO does not use, disclose, or permit access to CPNI for marketing purposes. Nor does VOIPO disclose or permit access to CPNI to third-parties. Accordingly, VOIPO has not implemented a system for obtaining customer consent either through the “Opt-in” or “Opt-out” approval processes. Moreover, because VOIPO does not use, disclose, or permit access to CPNI for any of the foregoing purposes, VOIPO has no reason to employ customer solicitation

notices.

Management Safeguards:

- VOIPO has developed a CPNI Compliance Manual (Manual), which sets forth in detail the FCC's rules and regulations governing the proper use and disclosure of CPNI. The Manual also sets forth in detail VOIPO's internal policies and operating procedures with respect to the protection of CPNI.
- VOIPO has designated a CPNI Compliance Officer who is responsible for the active monitoring, management, and training of all employees with access to CPNI.
- VOIPO has established a procedure to inform and train all registered employees on the proper use and disclosure of CPNI. Such training includes the distribution of a CPNI Compliance Manual to all the registered employees. Each employee must sign a statement verifying that they have received and reviewed VOIPO's CPNI Compliance Manual, and that they will comply with VOIPO's CPNI policies and procedures.
- VOIPO has established disciplinary procedures for any employee that wrongfully accesses, uses, or discloses CPNI. Any improper use of CPNI is treated as a serious offense, and will result in appropriate disciplinary action.
- Employees are instructed to report each potential CPNI violation or

breach to VOIPO's CPNI Compliance Officer, and VOIPO has a process for documenting and investigating each potential violation or breach.

- VOIPO reviews its CPNI procedures on an ongoing basis to ensure compliance with all FCC regulations, and will revise its procedures as needed to reflect any subsequent revisions to the applicable rules and regulations.

Authentication:

- VOIPO uses the procedures specified in 47 C.F.R. § 64.2010 to authenticate a customer's identity before sharing CPNI with that customer.
- VOIPO does not accept in-person visits so CPNI information will not be disclosed in person.
- VOIPO will only disclose CPNI over the telephone, based on customer- initiated contact, if the customer first provides VOIPO with a password that is not prompted by VOIPO asking for Readily Available Biographical Information or Account Information.
- VOIPO will permit online access to CPNI through a password that is not prompted by VOIPO asking Readily Available Biographical Information or Account Information.

Restricted Access to Records

- VOIPO's automated information system, which contains the CPNI of VOIPO's customers, is password-protected.
- There are very few individuals within VOIPO whose password level is sufficient enough to access the portion of the system containing CPNI. These employees receive specialized training concerning the protection of their passwords and physical workstations to ensure the protection of CPNI.
- All physical facilities containing CPNI are secured, with restricted physical access.

Management of Potential CPNI Security Breaches

- VOIPO has adopted procedures for notifying law enforcement and the FCC of a breach of its customers' CPNI.
- VOIPO will maintain a record of any and all potential CPNI breaches.
- Upon request for disclosure of CPNI for purposes of law enforcement, it is VOIPO's policy to validate the authenticity of all requests from law enforcement, and ensure that such requests are lawful before releasing CPNI.