

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template EB Docket 06-36

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

Date filed: February 28, 2019

Name of company(s) covered by this certification: ChimeNet

Form 499 Filer ID: 825042

Name of signatory: John J. Brady III

Title of signatory: Chief Financial Officer

Certification:

I, John J. Brady III, 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, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of 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 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 _____

JOHN J. BRADY III
CHIEF FINANCIAL OFFICER
ChimeNet, Inc

STATEMENT OF COMPLIANCE WITH CPNI RULES

ChimeNet, Inc. (the "Company") operates a private data network servicing business primarily in Connecticut. The Company provides services on a retail basis to enterprise customers. These services include various forms of managed connectivity, hosting, private line services, collocation services, internet access and high-speed data access.

ChimeNet 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 ChimeNet allow third parties access to CPNI for marketing-related purposes. If ChimeNet 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. ChimeNet 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 if this rule becomes relevant to the Company in the future. ChimeNet will also adopt the requisite record-keeping requirements should the Company use CPNI in the future for marketing-related purposes.

As permitted by the CPNI rules, the Company uses CPNI (1) to initiate, render, and bill and collect for telecommunications services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) to provide any inbound telemarketing or administrative services for the duration of a call; (4) for the purpose of providing customer premises equipment; and (5) in order to provision inside wiring, maintenance and repair services.

The Company has implemented processes and procedures to train its personnel as to when they are and are not permitted to use CPNI. For instance, all Company employees are required to abide by the Company's Code of Conduct, which requires employees to maintain the confidentiality of all information that is obtained as a result of their employment by the Company. Employees who violate the Company's Code of Conduct will be subject to discipline, including possible termination. All employees receive annual training on the Company's CPNI Protection Policy regarding the access and use of CPNI. Each employee is required to sign an acknowledgement stating that they have received a copy of and understand the policy. The Company has not received a complaint from a customer that it has misused CPNI in 2018.

The Company does not provide call detail records to customers over the phone and does not allow online access to customer's CPNI. CPNI is provided to customers only by U.S. Mail or by e-mail and only to a pre-approved list of authorized people identified by the Company's customers.

The Company has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, ChimeNet will notify affected customers. ChimeNet will maintain a record of any CPNI-related breaches for a period of at least two years.

The Company does not currently engage in any large-scale coordinated sales and marketing campaigns. A significant amount of the Company's marketing is focused on existing customers. The Company does some limited marketing of new services to existing customers on a case-by-case basis.