

Telehouse International Corporation of America

STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION

Set forth below is a statement summarizing the policies and procedures of Telehouse International Corporation of America ("Telehouse") which ensure adequate compliance with the Federal Communications Commission's ("FCC") CPNI regulations. See 47 C.F.R. § 64.2001 et seq. Telehouse provides broadband services exclusively.

As a provider of data services, the company does not provide "telecommunications services" and therefore does not have access to CPNI. Telehouse does not have information concerning the quantity, technical configuration, type, destination, location, or amount of use of telecommunications services which can be associated with individual customers.

Nevertheless, Telehouse has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI and, furthermore, the company has informed its employees of the company's CPNI compliance policy. Telehouse does not release or distribute CPNI to unauthorized individuals; neither does the company use CPNI in violation of Section 64.2001 § et seq. of the FCC's Rules.

Telehouse maintains and requires company and employee adherence to all applicable CPNI rules pursuant to a comprehensive internal CPNI Compliance Policies and Procedures Manual ("CPNI Manual"). This CPNI Manual contains sensitive information and therefore will be provided to the Federal Communications Commission ("FCC") upon request and subject to adequate protections from public disclosure.

Telehouse does not maintain CPNI in any manner which would give rise to the unauthorized disclosure of confidential information. Even in cases dealing with the limited information which is necessary to facilitate customer purchases broadband services, Telehouse takes steps prior to providing any requested information to assure itself that the individual making the request is authorized to obtain it.

To the extent CPNI exists, it is maintained by Telehouse in a secure location which is not accessible by company employees without going through the company's established security procedures. When such information is maintained on a computer, the computer and/or the individual file is password protected.

Moreover, any information constituting CPNI obtained by Telehouse is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes. In the event of unauthorized CPNI access, Telehouse will notify the requisite law enforcement agencies, and the customer when possible.

Telehouse did not have any breach of its customer records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because Telehouse does not provide telecommunication services, and does not know the identity of end-users whose traffic is routed through Telehouse, it cannot notify any end-user customers directly if a breach occurs. However, Telehouse has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than publicly reported information regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

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

COMPANY NAME: Telehouse International Corporation of America
REPORTING PERIOD: January 1, 2018 - December 31, 2018
FILER ID: 828094
OFFICER: Akio Sugeno
TITLE: Vice President

I, Akio Sugeno, hereby certify that I am an officer of Telehouse International Corporation of America ("Telehouse") and that I am authorized to make this certification on behalf of Telehouse. I have personal knowledge that Telehouse has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Telehouse or to any of the information obtained by Telehouse. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Telehouse employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Telehouse or to the information obtained by Telehouse.

Signed: 
On behalf of Telehouse International Corporation of America

Date: 2/27/2019

