

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

Annual 64.2009(e) CPNI Certification for:	2018 Covering Prior Calendar Year 2017
Date filed:	<u>01/31/2018</u>
Name of company covered by this certification:	<u>Ingenuity Telecom, LLC</u>
Form 499 Filer ID:	<u>830885</u>
Name of signatory:	<u>Avi Kornblum</u>
Title of signatory:	<u>CEO/President</u>

I, Avi Kornblum, certify that I am an officer of Ingenuity Telecom, LLC (the company named above, herein referred to as "the company"), 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. S: 64.2001 et seq., which is a subpart to implement **section 222 of the Communications Act of 1934 as amended, 47 U.S.C. 222.**

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. See attached accompanying statement for details.

The company **has not had to taken any actions** in the form of proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers against in the past year.

The company understands that it must report on any information that it has with respect to the processes pretexters are using to attempt to access CPNI, and what steps the company is taking to protect CPNI.

Note, the company recognizes "pretexting" as "the process in which personal information is obtained by fraudulent means including identity theft, selling personal data for profit, or using some other method for snooping for information whose release was not authorized by the owner of the information. See attached accompanying statement for details on how the applicant guards CPNI data against pretexting.

Signed  [signature]

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI and the company has received 0 number of customer complaints received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint as follows:

- (1). Instances of improper access by employees: 0 complaints
- (2). Instances of improper disclosure to individuals not authorized to receive the information: 0 Complaints
- (3). Instances of improper access to online information by individuals not authorized to view the information). 0 Complaints

If it was affirmative, above, the company would have provided summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.

The company is aware of "Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007)("EPIC CPNI Order"). See 47 U.S.C. S: 222".

The company understands "47 C.F.R. S: 64.2009(e) in that it states:

- (1). "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis.
- (2). That the officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart.
- (3). That the carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart.
- (4). That the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.
- (5). That this filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."

Signed X  [signature]