



February 27, 2019

Federal Communications Commission
Office of the Secretary
445 12th Street, SW,
Room TW-A325
Washington, DC 20554

Re: Annual CPNI Certification for CoreDial LLC , 499 Filer ID #826201

I, Warren Barratt, 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 CFR § 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, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) 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.

Yours very truly,

A handwritten signature in blue ink, appearing to read "Warren Barratt", written over a horizontal line.

Warren Barratt, Chief Financial Officer



CoreDial, LLC CPNI Policy and Training Handout

Introduction

On April 2, 2007, the Commission released a Report and Order and Further Notice of Proposed Rulemaking in CC Docket. 96-115 and WC Docket NO. 04-36 (EPIC CPNI Order) in which the Commission strengthened its privacy rules, pursuant to section 222 of the Communications Act, as amended, by adopting additional safeguards to protect CPNI against unauthorized access and disclosure.

What is Customer Proprietary Network Information (CPNI)?

CPNI includes but is not limited to the following private customer network information:

- Personal Information
 - User names
 - Passwords
 - Name
 - Address
 - Phone numbers
- Any and all call activity
- Current and/or past features and services such as
 - Call forwarding
 - Voicemail
 - Call waiting
 - Long distance
 - Service plans
 - Any services with monthly recurring charges
 - Any services with non recurring charges
 - Any included services, service bundles or packages

CoreDial, LLC's CPNI Policy

CoreDial has established the following procedures to ensure compliance with the FCC's CPNI rules and regulations (see 47 C.F.R. S: 64, 2001 et seq.). All CoreDial employees are required to adhere to the following CPNI procedures. Failure to do so may be grounds for termination from CoreDial, LLC and/or further legal action.

CPNI Verification Process

Inbound Callers: Any inbound caller to any CoreDial department or employee that requests access to CPNI must first be validated using the following processes.

1. Authenticate caller using the Portal's PIN System



- a. Log into the Portal
 - b. Select the customer's PBX
 - c. On the customer's "PBX Info" screen, enter the PIN that the customer gives you in the "PBX PIN:" field and click the "Validate PIN" button
 - d. If the PIN is successfully validated you may provide the customer's CPNI to the caller
 - e. If the PIN is not valid, you may validate the customer using the alternate below method. However NO CPNI may be provided until the caller is validated
2. Authenticate by calling the customer back with any number that is registered to that customer's PBX.
 - a. Log into the Portal
 - b. Select the customer's PBX
 - c. On the customer's "Phone Numbers" screen, a list of phone numbers will appear. Ask the caller to suggest a number to be called. **DONOT PROVIDE** the caller with any number from the list.
 - d. If the number the caller provided is on the "Phone Numbers" screen, hang up and call the customer back using that phone number. The caller is now validated and may be provided CPNI.

Portal Users: All portal users must log in with their CoreDial, LLC supplied user name and password. Lost passwords are to be recovered using the "Forgot Password?" option. If the user cannot use the portal's automated password recovery utility they must call CoreDial, LLC and be validated as an Inbound Caller.

Email Users: Email users do not have the ability to gain access to or change CPNI.

For More Information

Contact CoreDial's Customer Care Department, 215-297-4400, Option 2.