Company Name ("Carrier"): Accoona Global LLC

STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission'') regulations regarding the protection of customer proprietary network information ("CPNI").

* Carrier has adopted a manual and keeps it updated with FCC CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.
* Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier provides annual training for all employees and individual training for new employees. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
* Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
* Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
* Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
* Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations, electronically or otherwise. In connection with these procedures, Carrier has established a system of personal identification numbers (PINs), passwords and back-up authentication methods for all customer and accounts, in compliance with the requirements of applicable Commission rules.
* Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.
* Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.