

Annual 47 CFR § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for [2018] covering the prior calendar year [2017]

1. Date filed: [February 28, 2018]

2. Name of company(s) covered by this certification: [KPN International Network Services, Inc. dba KPN INS, Inc. (822522)]

3. Form 499 Filer ID: [822522]

4. Name of signatory: [Ellen Schmidt]

5. Title of signatory: [VP, General Counsel & Secretary]

6. Certification:

I, [Ellen Schmidt], 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. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

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.

Signed  [Signature of an officer, as agent of the carrier]

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

Statement Regarding iBasis CPNI Compliance Activities

In order to ensure that the Company is in compliance with the requirements set forth in Section 64.2002 et. Sec. of the Commission's rules (the "Rules"), the Company has taken the following actions:

Communication of Rules to Management

The Legal Department held numerous meetings with managers within the Company to provide an overview and understanding of the rules.

Policies and Procedures Development and Documentation

As a result of the management meetings a policy and procedures document was developed that reflects the alignment of the business policies and practices with the legal requirements of the Rules. This document addresses the specific rules relating to issues such as:

- Access to CPNI and CDRs – online and phone requests
 - Authentication process requirements
 - Issues re: account changes and passwords
- Recording and maintaining information
 - Tracking of CPNI requests
 - Breach Notification Forms and Process
- Customer and agency notification issues
- Marketing practices and privacy policies

Employee Responsibilities

Specific employees were identified to take responsibility for various aspects of the process to ensure ongoing compliance with the Rules, including processing CPNI requests, recording and maintaining records, notification, oversight, legal questions, etc.

Employee Training

Various training sessions with affected employees and customer service representatives were held to go over the rules and the policy and procedure document. The policy and procedures document is posted on the Company's intranet for access by current and future employees.