

Annual 47 C.F.R. § 64.2009fe) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date filed: February 28, 2018

Name of companies covered by this certification: **Masergy Cloud Communications, Inc. and Masergy Communications, Inc.**

Form 499 Filer 1D: **827368 and 822230**

Name of signatory: Irene Peterson

Title of signatory: Assistant Secretary

I, Irene Peterson, certify that I am an officer of the companies named above, and acting as an agent of the companies, 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. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions against data brokers in the past year.

The companies have not received any 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 C.F.R. §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.

Signed: _____



**CPNI Corporate Certification
Joint CPNI Policy Statement**

I, Irene Peterson, Assistant Secretary, am a corporate officer of Masergy Cloud Communications, Inc. and Masergy Communications, Inc. Pursuant to 47 U.S.C. § 222; 47 C.F.R. §64.2009 of the Communications Act, I hereby state that I am responsible for company compliance with the FCC's CPNI rules and have personal knowledge that the companies are in compliance with the rules. The companies' compliance is demonstrated by this Joint CPNI Policy Statement.

I attest to the following:

1. The companies maintain CPNI in a variety of databases and record systems. Each of these systems is protected against unauthorized access.
2. Consistent with the Commission's rules, the companies use, disclose, and permit access to CPNI without customer approval for the purposes of providing telecommunications services and VoIP, billing and collecting for services rendered, protecting the companies' rights and property, and providing customer information required by a Public Safety Answering Point.
3. A Corporate Officer has been named as the companies' CPNI Compliance Officer and will certify annually that the companies are in compliance with all Federal CPNI rules and will make the required annual filing to the FCC.
4. The companies secure clients' approval to use CPNI for marketing purposes between itself and its affiliates, prior to any use of CPNI for marketing purposes, with the clients' always retaining the option to opt out at any time. At this time, however, the companies do not use CPNI in their marketing efforts. Customer Notice and Authorization forms are readily available to Company employees / Compliance Officer for distribution to customers upon request.
5. Our companies maintain records of compliance for at least the minimum period as required by FCC rules and regulations.
6. Our companies have a supervisory approval process in place for any proposed outbound marketing request for CPNI.
7. Our companies have a notification process in place to alert law enforcement, the FCC and affected customers in the event of a CPNI breach.
8. Our companies have a notification process in place for immediate notice to customers when a customer initiated password or back-up for forgotten passwords; an on-line account; or the address of record is created or changed.
9. Employees who might need to access Customer Service Records (CSR) stored in the OSS of other carriers/service providers have been provided a copy of the CSR Policy, including penalties for non-compliance, and their signed acknowledgements have been obtained and filed.



10. Our companies have a formal process in place to certify that CPNI protection policies have been instituted by our applicable vendors, service bureaus and wholesale carriers.

Signed: Irene Peterson
Irene Peterson