

CPNI Certification Accompanying Statement

EB Docket 06-36

Annual 64.2009(e) CPNI Certification Accompanying Statement for 2018

Truphone Limited has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that Truphone Limited is in compliance with the FCC's customer proprietary network information ("CPNI") rules. This statement is a summary of Truphone Limited's policies and procedures designed to safeguard CPNI.

All relevant Truphone Limited staff have received training in relation to the FCC's CPNI regulations. As a result, staff are aware of when they are and are not authorised to use CPNI. Truphone Limited has implemented express disciplinary procedures for unauthorized use of CPNI.

Truphone Limited has implemented measures to discover and protect against attempts to gain unauthorized access to CPNI.

Truphone Limited has implemented measures to authenticate customers. Truphone Limited has implemented a policy to allow call detail information disclosure only in accordance with the following FCC regulations:

- A) The customer providing their pre-established password; or
- B) Either phoning the customer back on the number of record, or sending their information to their address of record.

Truphone Limited employees are required to sign a non-disclosure agreement which requires them to protect all confidential information.

Truphone Limited will obtain Opt-Out approval for the use of CPNI for marketing purposes if the marketing is outside the category of the customer's subscription, but is still based on communications-related products and services. Truphone Limited has implemented a policy whereby any use of CPNI to market non-communications

related products and services requires Opt-In approval to be obtained from the customer.

Truphone Limited has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

All Truphone Limited sales and marketing campaigns must be approved by management. We have established a supervisory review process for all proposed outbound marketing requests for customer approval.

Truphone Limited has established a database in which to record all uses of CPNI for marketing purposes. This database includes a description of each campaign, the specific CPNI that was used, and what products and services were offered. This record will be retained for a minimum of one year.

Truphone Limited has assigned an officer to sign the annual compliance certificate, stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the FCC's CPNI rules.

Truphone Limited has established a procedure whereby we will provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Truphone Limited has implemented measures to discover and to protect against unauthorized attempts to access CPNI. Truphone Limited also has implemented procedures pursuant to which it will track breaches of CPNI, and it will notify the United States Secret Service and the Federal Bureau of Investigation in accordance with the FCC's rules.

Truphone Limited will notify its customers in accordance with the FCC's rules. Truphone Limited will maintain a record of notifications to the USSS, FBI, for the time period specified in the FCC's rules.

Truphone Limited will track customer complaints regarding CPNI, by keeping records of all complaints and maintaining these records for the minimum period required by the FCC.