

02/28/2019

Telnyx LLC
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Chicago, IL 60654

Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification

EB Docket 06-36

This is the annual 64.2009(e) CPNI Certification of Telnyx LLC for 2019 covering the prior calendar year 2018.

1. Date Filed: February 28, 2019
2. Name of company covered by this certification: Telnyx LLC
3. Form 499 Filer ID: 827896
4. Name of signatory: Lucy Kevorkian
5. Title of signatory: General Counsel
6. Certification: see below.

I, Lucy Kevorkian, 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 C.F.R. § 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 against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of or access to 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 and may subject it to enforcement action.



Signature

Lucy Kevorkian / General Counsel

Print Name/ Title

Officer of:

Telnyx LLC

Company

02/28/2019

Executed

Accompanying Statement to Annual CPNI Compliance Certification for Telnyx LLC

In compliance with 47 C.P.R. § 64.2009(e), I, Lucy Kevorkian, acting on behalf of Telnyx LLC, certifies the Company has taken the following actions:

Employee Training and Discipline

- Trained all employees and personnel as to when they are and are not authorized to use CPNI.
- Instituted an express disciplinary process for unauthorized use of CPNI.

Sales and Marketing Campaign Approval

- Guaranteed that all sales and marketing campaigns are approved by management.
- The Company maintains a record of any marketing campaigns, which includes a description of each campaign and what products or services were offered.

Record-Keeping Requirements

- Established a system to maintain a record of all sales and marketing campaigns that use their customers' CPNI, including marketing campaigns of affiliates and independent contractors.
- Designed its customer relationship / service records in such a manner that the status of a customer's CPNI approval can be clearly established.
- Ensured that these records include 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.
- Made certain that these records are maintained for a minimum of one (1) year.

Establishment of a Supervisory Review Process

- Established a supervisory review process for all outbound marketing situations.
- Certified that under this review process, all sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval.

Opt-In

- Guaranteed that the Company only discloses CPNI to agents, affiliates, joint venture partners, independent contractors or to any other third parties only after receiving "opt-in" approval from a customer.

- Verified that the Company enters into confidential agreements with joint venture partners, independent contractors or any other third party when releasing CPNI.
- The Company honors a subscriber's approval or disapproval until the subscriber revokes or limits such approval or disapproval.

Opt-Out Mechanism Failure

- Established a protocol through which the Company will provide the FCC with written notice within five (5) business days of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Compliance Certificates

- Executed a statement, signed by an officer, certifying that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the FCC's CPNI regulations.
- Executed a statement detailing how operating procedures ensure compliance with CPNI regulations.
- Executed a summary of all customer complaints received in the past year concerning unauthorized release of CPNI.

Customer Authentication Methods

- Instituted customer authentication methods to ensure adequate protection of customers' CPNI. These protections only allow CPNI disclosure in accordance with the following methods:
 - Disclosure of CPNI information in response to a customer providing a pre-established password;
 - Disclosure of requested CPNI to the customer's address or phone number of record; and
 - Access to CPNI if a customer presents a valid photo ID at the carrier's retail location.

Customer Notification of CPNI Changes

- Established a system under which a customer is notified of any change to CPNI. This system, at minimum, notifies a customer of CPNI access in the following circumstances:
 - password modification,
 - a response to a carrier-designed back-up means of authentication,
 - online account changes, or
 - address of record change or creation.
- Established a system in which notices state that the customer has a right and the Company has a duty to protect the confidentiality of CPNI.

Notification to Law Enforcement and Customers of Unauthorized Access

- Established a protocol under which the appropriate Law Enforcement Agency ("LEA") is notified of any unauthorized access to a customer's CPNI.
- Ensured that all records of any discovered CPNI breaches are kept for a minimum of two (2) years.

Summary of Actions Taken Against Data Brokers by Telnyx LLC

In compliance with 47 C.P.R. § 64.2009(e), I, Lucy Kevorkian, acting on behalf of Telnyx LLC, summarize the actions that the Company has taken against data brokers within the last year:

Detailed list of "any actions" taken against pre-texters or data brokers.

The term "any actions," means: proceedings instituted or petitions filed by a carrier at either state commissions, the court system, or at the Federal Communications Commission against data brokers.

For example:

1) On October 2, 2007, "ABC Company" filed a complaint in the Federal District Court of New Jersey against "John Doe" for attempting to obtain customers' CPNI information through "fraud, trickery, and deceit." This case is entitled ABC Company v. John Doe, Case No. 07-12345-67.

No such actions taken against data brokers within the last year.

Summary of Customer Complaints Received by Telnyx LLC

In compliance with 47 C.F.R. § 64.2009(e), I, Lucy Kevorkian, acting on behalf of Telnyx LLC, provide a summary of customer complaints received within the last year:

- 1) The Company has received no complaints as a result of improper access by employees.
- 2) The Company has received no complaints as a result of improper disclosure to individuals not authorized to receive the information.
- 3) The Company has received no complaints as a result of instances of improper access to online information by individuals not authorized to view the information.
- 4) In addition, the Company is aware of the following processes pre-texters are using to attempt to access CPNI, and what steps carriers are taking to protect CPNI:

None.