



**Annual 47 CFR § 64.2009(e) CPNI Certification – Meriplex Communications, Ltd.**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: 3-1-2019

2. Name of company(s) covered by this certification: Meriplex Communications, Ltd.

3. Form 499 Filer ID: 825982

4. Name of signatory: Janet Fritz

5. Title of signatory: Senior VP of Finance

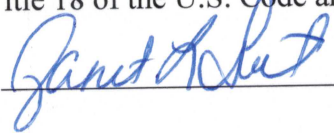
6. Certification: I, Janet Fritz, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 CFR § 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.

The company has not received 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 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

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Proprietary & Confidential

Filed via ECFs on 2/28/19

## STATEMENT OF COMPLIANCE

Meriplex Communications, Ltd.

February 13, 2019

Meriplex Communications, Ltd. employs the procedures necessary to comply with its customer contracts and privacy policy. These procedures, some of which are listed below, enable Meriplex Communications, Ltd. to comply with the Commission's Customer Proprietary Network Information (CPNI) rules. Employees who are authorized access to CPNI receive specific training to ensure compliance with the rules, customer contracts and Meriplex Communications, Ltd.'s privacy policy. Meriplex Communications, Ltd. has established security logs to record privacy related actions. In addition to addressing privacy of customer records in its contracts, Meriplex Communications, Ltd. is also sending informational notices to its customers (copy attached).

- Meriplex Communications, Ltd. serves only business customers. Its customer contracts specifically address the privacy and security of customer information.
- Each customer has a dedicated account representative.
- Meriplex Communications, Ltd. does disclose CPNI to an unaffiliated third party.
- Meriplex Communications, Ltd. limits CPNI access to only authorized and trained employees.
- Authorized employees must use a valid login and password to access CPNI.
- Meriplex Communications, Ltd. provides password protection for online account access.
- Any changes in CPNI, disclosures or use by Meriplex Communications, Ltd.'s marketing personnel will be recorded in a security log.
- Because the release of call detail information over the telephone presents an immediate risk to privacy, Meriplex Communications, Ltd. does not release call detail information based on customer-initiated telephone contact. When requested to do so, it may send such information to the customer's address of record; or when an authorized employee calls the telephone number of record and discloses the information.
- Meriplex Communications, Ltd. will immediately notify its customers of a change to its account or address of record. Notification may be by voicemail, text message or by mail to the customer's address of record.
- If there has been a breach of CPNI, Meriplex Communications, Ltd. will provide electronic notification of the breach within seven days after it notifies the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI), unless the USSS or FBI requests that Meriplex Communications, Ltd. postpone its disclosure. Meriplex Communications, Ltd. will however notify affected customers immediately if there is a risk of immediate and irreparable harm.
- Meriplex Communications, Ltd. will obtain opt-in consent from a customer before disclosing a customer's CPNI to a joint venture partner or an independent contractor for the marketing of communications-related services to the customer.
- Supervision is ongoing and supervisors audit records at least annually.





## **Customer Proprietary Network Information Notice for Customers of Meriplex Communications, Ltd.**

### **Overview**

Meriplex Communications, Ltd. is committed to maintaining customer privacy. There are special protections for personal information we obtain in providing service to you. That information, when matched to your name, address, or telephone number is known as "Customer Proprietary Network Information" or CPNI. Examples of CPNI include who, when and where you call; where you call from; how much you spend on local and long-distance phone calls; the phone services you receive; pricing plans; billing information; and your PIN number, password and other security measures. We do not sell your CPNI information, and your CPNI will not be disclosed to third parties outside of our company and our affiliates, agents, or joint venture partners except as otherwise required by law.

By law, we can use your CPNI to offer our communications-related services to you, unless you request otherwise during the 30-day period following receipt of this notice. You can also withdraw the right for us to use your CPNI for these purposes at any time by contacting us at 866.637.4235, or by email to [notice@meriplex.com](mailto:notice@meriplex.com). Regardless, we do not share your CPNI with vendors or any joint venture partners for marketing purposes without your prior consent.

When you contact us, we may ask for your consent to use your CPNI in marketing service packages. This consent applies only for the duration of the call or Internet session. As an alternative, you can consent by writing to the address listed on your bill or by email to [notice@meriplex.com](mailto:notice@meriplex.com). Restricting our use of your CPNI will not affect your service. If you previously contacted us to approve or restrict our use of your CPNI, we will continue to honor your request and you do not need to contact us again.

### **Employee Authorization**

Only authorized and trained Meriplex Communications, Ltd. employees may access and use customer CPNI. Authorized employees designated by the Meriplex Communications, Ltd. management must be trained in the use of this policy and be made aware of the security and record-keeping requirements of this policy.

Any employee who is found to have violated this policy will be subject to disciplinary action up to and including termination.

### **CPNI Security**

An authorized Meriplex Communications, Ltd. or Customer employee must have a valid login identification and password to access CPNI online. CPNI (including CDR information) may be disclosed over the phone, via mail or in person to authorized contacts on the customer's account.

Online access to CPNI (including CDR information) is password protected, and password authentication may be done through authorized contacts on the customer's account.

Changes to the customer's address of record may be done through authorized contacts on the customer's account, and in such instances, no separate notification of the change(s) will

be provided to the customer. CPNI (including CDR information) may be disclosed to any person designated by customer, but only upon receipt of a written request for such disclosure and verification of the request by the Company.

#### **CPNI Use and Tracking**

Federal Law permits Meriplex Communications, Ltd. the use to, disclose, and permit access to CPNI obtained from our customers, either directly or indirectly, to:

- initiate, render, bill, and collect for telecommunications services;
- protect our rights and property, and protect our users of these services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, these services;
- provide any inbound telemarketing, referral, or administrative services to you for the duration of the call, if you initiated the call and you approve of the use of this information to provide these services;
- As necessary, Meriplex Communications, Ltd. must disclose information to comply with court orders or subpoenas.

Any changes or disclosures by employees and use by marketing personnel of CPNI are recorded in the Meriplex Communications, Ltd. CPNI security log.