

March 1, 2018

**Via ECFS**

Ms. Marlene H. Dortch  
Office of the Secretary, FCC  
455 12<sup>th</sup> St. SW  
Washington, DC 20554

Re: 2017 CPNI Compliance Certification

Dear Ms. Dortch:

Attached for filing is RingCentral, Inc.'s 2017 CPNI Compliance Certification and Statement as required by 47 C.F.R. § 64.2009(e).

Respectfully submitted,



Adrienne E. Fowler  
*Counsel to RingCentral, Inc.*

**Annual 47 CFR § 64.2009(e) CPNI Certification Template**

**EB Docket 06-36**

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

1. Date filed: 02/27/2018
2. Name of company(s) covered by this certification: RingCentral, Inc.
3. Form 499 Filer ID: 827129
4. Name of signatory: Bruce Johnson
5. Title of signatory: Vice President, Legal
6. Certification:

I, Bruce Johnson, 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

**RingCentral, Inc.**  
**2017 CPNI Compliance Statement of Operating Procedures**

RingCentral, Inc. submits this compliance statement as required by 47 C.F.R. § 64.2009(e). During the 2017 reporting period, RingCentral had in place a Customer Proprietary Network Information (CPNI) Policy that is sufficient to ensure compliance with the Commission's CPNI regulations.

**General duty, training, and discipline**

RingCentral's CPNI Policy defines CPNI consistently with 47 C.F.R. § 64.2003, addresses proper handling and use of CPNI, imposes a duty on employees to safeguard CPNI, and provides that violations of RingCentral's CPNI Policy will subject an employee to disciplinary action, up to and including immediate termination of employment.

RingCentral makes CPNI available to employees only on a need-to-know basis. During the reporting period, RingCentral provided training on its CPNI Policy for employees who have access to CPNI.

**Use of CPNI (47 C.F.R. §§ 64.2005 to 64.2009)**

RingCentral does not use, disclose, or permit access to CPNI for marketing purposes except as permitted by Section 222 of the Communications Act and regulations implementing Section 222 of the Communications Act. RingCentral does not disclose CPNI to third parties or permit third parties to access or use CPNI, except as permitted by Section 222 of the Communications Act and regulations implementing Section 222 of the Communications Act.

**Safeguards on the disclosure of CPNI (47 C.F.R. § 64.2010)**

RingCentral protects against attempts to gain unauthorized access to CPNI and authenticates a customer prior to disclosing CPNI. It does not operate retail locations; accordingly, its customers have no in-store access to CPNI.

For access to CPNI over the telephone, RingCentral authenticates a customer through use of a password that is not prompted by asking for readily available biographical information or account information.

Customers may also access their CPNI online and establish a password for future access only after being authenticated without using readily available biographical information or account information. After initial authentication, customers may access CPNI online only by providing their pre-established password, which is not prompted by RingCentral asking for readily available biographical information or account information.

Customers that have lost or forgotten their passwords may retrieve their passwords by submitting their previously provided answer to a secret question, which does not involve the use of readily available biographical information or account information. If a customer cannot provide the correct password or the correct response to the shared secret question, the customer must be re-authenticated and must establish a new password.

RingCentral's CPNI Policy requires immediate customer notification whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed. This notice does not reveal the changed information and is sent to the existing telephone number of record, by mail to the existing physical address of record, or by e-mail to the existing e-mail address of record, and not to any address or number that has been changed.

**Notification of CPNI security breaches (47 C.F.R. § 64.2011)**

RingCentral is unaware of any breach of CPNI during the reporting period. RingCentral's CPNI Policy requires notification of relevant law enforcement agencies and customers in accordance with FCC rules in the event of a breach of CPNI. RingCentral will maintain records of any breaches discovered, notifications made to law enforcement, and notifications made to customers. These records will include, where available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. RingCentral will maintain these records for 2 years.

**Any actions against data brokers or customer complaints (47 C.F.R. § 64.2009(e))**

RingCentral did not take any actions against data brokers in 2017, nor did it receive any customer complaints concerning the unauthorized release of CPNI.

**Instances where opt-out mechanisms do not work properly (47 C.F.R. § 64.2009(f))**

During the reporting period, RingCentral has not faced any instance where the opt-out mechanisms did not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.