



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

**EB DOCKET 06-36**

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

Date filed: February 28, 2019

Name of company covered by this certification: 8x8, Inc.

Form 499 Filer ID: 825996

Name of signatory: Matthew Zinn

Title of signatory: SVP, General Counsel, Secretary and Chief Privacy

Officer

I, Matthew Zinn, 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 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 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.

Signed: \_\_\_\_\_

Matthew Zinn

SVP, General Counsel, Secretary and Chief Privacy Officer, 8x8, Inc.

**Attachments:** Accompanying Statement explaining CPNI procedures



**47 C.F.R. § 64.2009(e) CPNI CERTIFICATION FILING**  
**CALENDAR YEAR 2018**  
**EB Docket No. 06-36**

**Statement of CPNI Procedures and Compliance**

8x8, Inc., a Delaware corporation ("8x8" or "Company"), does not use or permit access to CPNI to market any services outside of the "total services approach" as specified in 47 CFR §64.2005. Nor does the Company allow affiliates or third parties access to CPNI for third party product marketing-related purposes. If 8x8 elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR §64.2001 *et seq.*, including the institution of operational procedures to ensure that the appropriate notification is provided and customer approval is obtained before CPNI is used or disclosed. 8x8 will develop and implement an appropriate tracking method to ensure that customers' CPNI approval status can be verified prior to using CPNI for marketing-related purposes. The Company will also adopt the requisite record-keeping requirements should it use CPNI in the future for marketing-related purposes.

Consistent with the Commission's rules, 8x8 uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of 8x8, other users, and other carriers from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services that are within the same class of services to which the customer already subscribes.

8x8 has implemented procedures whereby it will not provide CPNI without proper customer authentication and will only provide CPNI and call detail records over the phone by first employing proper customer authentication methods, including the use of a passphrase. Otherwise, call detail records are provided exclusively via e-mail or U.S. mail, to the postal or electronic address of record. 8x8 has implemented procedures to inform customers of change of address, e-mail and other changes to account information in a manner that conforms to the relevant rules.

8x8 has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, 8x8 will notify affected customers. 8x8 will maintain a record of any CPNI-related breaches for a period of at least two years.

All 8x8 employees who have access to CPNI are required to receive training about CPNI compliance. The training specifically provides and requires employees to acknowledge that they will be subject to discipline, including possible termination for not following the rules for using and safeguarding CPNI.