

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket No. 06-36**

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

1. Date filed: March 1, 2019
2. Name of company(s) covered by this certification: KPN International Network Services LLC, dba KPN INS LLC.
3. Form 499 Filer ID: 822522
4. Name of signatory: Hugo van den Akker
5. Title of signatory: Officer
6. Certification:

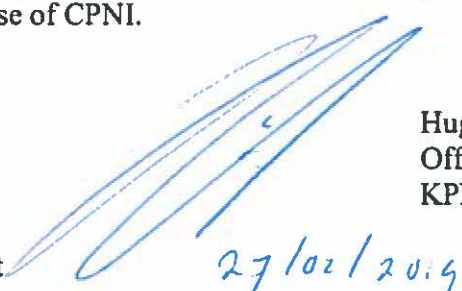
I, Hugo van den Akker, certify that I am an officer of KPN International Network Services LLC, dba KPN INS LLC, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 CFR § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that it 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.

Attachment



27/02/2019

Hugo van den Akker  
Officer  
KPN International Network Services LLC

## **Statement Regarding KPN International Network Services LLC** **CPNI Compliance Activities**

In order to ensure that the Company is in compliance with the requirements set forth in Section 64.2002 *et seq.* of the Commission's rules (the "Rules"), the Company has taken the following actions:

### **Communication of Rules to Management**

The Legal Department held numerous meetings with managers within the Company to provide an overview and understanding of the rules.

### **Policies and Procedures Development and Documentation**

As a result of the management meetings a policy and procedures document was developed that reflects the alignment of the business policies and practices with the legal requirements of the Rules. This document addresses the specific rules relating to issues such as:

- Access to CPNI and CDRs- online and phone requests
  - Authentication process requirements
  - Issues re: account changes and passwords
- Recording and maintaining information
  - Tracking of CPNI requests
  - Breach Notification Forms and Process
- Customer and agency notification issues
- Marketing practices and privacy policies

### **Employee Responsibilities**

Specific employees were identified to take responsibility for various aspects of the process to ensure ongoing compliance with the Rules, including processing CPNI requests, recording and maintaining records, notification, oversight, legal questions, etc.

### **Employee Training**

Various training sessions with affected employees and customer service representatives were held to go over the rules and the policy and procedure document. The policy and procedures document is posted on the Company's intranet for access by current and future employees.

