

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

EB Docket 06-36

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

1. Date Filed March 1, 2018
2. Name of company covered by this certification: Affiniti LLC
3. Form 499 Filer ID: 829950
4. Name of the signatory: Andrew Perlmutter
5. Title of signatory: President and Chief Executive Officer
6. Certification:

I, Andrew Perlmutter, certify that I am President and Chief Executive Officer of Affiniti, LLC (the "Company"), and, acting as an agent of the Company, I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commissioner's rules governing the safeguarding and use of customer proprietary network information ("CPNI"), 47 C.F.R. §§ 64.2001-64.2011 (the "CPNI Rules"). As required by 47 C.F.R. § 64.2009(e), this certification pertains to the period from January 1, 2017 through December 31, 2017 (the "Certification Period").

Attached to this certification is a statement explaining how the Company's operating procedures ensure that the Company is in compliance with the CPNI Rules, which statement is incorporated by reference into this certification.

The Company has not taken any actions against data brokers during the Certification Period.

The company did not receive any customer complaints during the Certification Period concerning the unauthorized release of CPNI.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on February 27, 2018

Respectfully submitted,


Andrew Perlmutter
President and Chief Executive Officer
Affiniti, LLC

Accompanying Statement to
Annual CPNI Certification Pursuant to 47 C.F.R.
§ 64.2009(e)

Affiniti, LLC

Affiniti, LLC ("the Company") has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's regulations regarding the protection of customer proprietary network information ("CPNI") rules. *See* 47 C.F.R. §§ 64.2001-64.2011.

During the period from January 1, 2017 through December 31, 2017 (the "Certification Period"), the Company provided hosted Voice over Internet Protocol ("VoIP") service to enterprise customers (primarily school districts) under the Commission's E-rate program. The Company's minimal use of customer information is strictly limited to internal call routing information necessary to connect calls to and from the local exchange carrier ("Call Routing Information").

The Company's relationship with its enterprise customers is governed by private contractual arrangements. Pursuant to those contracts, any disclosure of CPNI to a customer is made only to customer employees that are recognized by Company personnel as having authorization to access such data.

The Company does not share its customers' CPNI within the Company or with any third parties for marketing purposes.

The Company's employees have been trained in the appropriate use of CPNI, and the Company has established disciplinary procedures for violation of its CPNI policy.

If an employee becomes aware of any suspected breach of CPNI protections, he or she is instructed immediately to notify his or her supervisor, who will then be responsible, in consultation with legal counsel, for determining if the Company has experienced a breach and, if one has occurred, for taking the steps required by the Commission's CPNI rules, including notifying the United States Secret Service, the Federal Bureau of Investigation, and the customer in a lawful and timely manner.