

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

Alteva, Inc.
400 Market Street, Suite 1100
Philadelphia, PA 19106

EB Docket 06-36

Date Filed: February 28, 2018

<u>Name of Company Covered by this Certification:</u>	<u>499 Filer ID</u>
Alteva of Warwick, LLC	804651
Alteva Solutions, Inc.	825998

Name of signatory: Matthew G. Conroy
Title of signatory: Chief Financial Officer

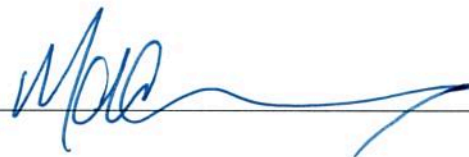
I, Matthew G. Conroy, certify that I am an officer of Alteva, Inc. and its wholly-owned subsidiaries Alteva of Warwick, LLC and Alteva Solutions, Inc. ("Companies") and, acting as an agent of the Companies, that I have personal knowledge that the Companies have established operating procedures that are 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 Companies' procedures ensure that the Companies 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 Companies have 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 Companies have not received customer complaints in the past year concerning the unauthorized release of CPNI.

The Companies represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Companies 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: 

ALTEVA, INC.
STATEMENT OF CPNI PROCEDURES AND COMPLIANCE

Alteva, Inc. ("Alteva") provides retail end user telecommunications services through its subsidiary companies:

Company

Alteva of Warwick, LLC	499 Filer ID 804651
Alteva Solutions, Inc.	499 Filer ID 825998

Alteva does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Alteva has trained its personnel not to use CPNI for marketing purposes. Should Alteva elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Alteva has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

New clients are provided with the opportunity to create a 4 digit PIN code at the time of subscription for service. These customers must utilize the PIN number whenever they contact the company for CPNI related issues. Customers that do not opt for the PIN system must provide at least three (3) identifying pieces of information to ensure the company is discussing the account with an authorized individual.

Although Alteva never has had an instance where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI, it still has procedures in place to track these instances, and notify the appropriate agencies, should they occur. Alteva has processes in place to safeguard the call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to these records. All call detail is stored in a database that is protected; only authorized Alteva personnel have access to the database. It is not accessible by anyone outside the company.

ALTEVA, LLC
STATEMENT OF CPNI PROCEDURES AND COMPLIANCE
(CONTINUED)

The Company does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI, but does take steps to protect CPNI from pretexters as described in this statement.

The Company has not taken any actions against data brokers in the last year. Alteva has processes in place to safeguard the call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to these records. All call detail is stored in a database that is protected; only authorized Alteva personnel have access to the database. It is not accessible by anyone outside the company.

The Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2017.