

## **Statement of CPNI Procedures of Joink, LLC**

February 28, 2018

Joink, LLC (“Joink” or the “Company”) has established internal operating procedures pursuant to Section 222 of the Communications Act, as amended (47 U.S.C. Sec. 222) and Sections 64.2001 et seq of the rules of the Federal Communications Commission to safeguard customer proprietary network information (“CPNI”).

Joink provides VoIP services to enterprise customers as well as other non-telecommunications services to residential and business customers. Joink currently does not use, nor does it have plans to use, CPNI for marketing purposes. It does not provide CPNI to any affiliated or non-affiliated parties except as necessary to provide services to its customers and as permitted under Section 222(d) of the Communications Act.

Joink safeguards CPNI by:

- Training employees regarding the Company’s policies to protect customer information, including CPNI;
- Instructing employees not to conduct any marketing without internal oversight and approval to ensure that the CPNI requirements are followed;
- Taking disciplinary actions against employees for violations of the Company’s CPNI policies;
- Establishing a process to maintain applicable CPNI-related records (including sales and marketing campaigns) that the Company may undertake;
- Designating a corporate officer who is responsible for overseeing the Company’s compliance with the CPNI requirements; and
- Establishing procedures for notifying the FCC, law enforcement and customers in the event of breaches of CPNI.

To Joink’s knowledge, no CPNI was obtained by any data broker or unauthorized party in 2017. Joink took no action against data brokers in 2017, and it received no customer complaints in 2017 regarding the unauthorized release of CPNI.

## Joink, LLC

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

COMPANY NAME: Joink, LLC

REPORTING PERIOD: January 1, 2017 - December 31, 2017

FILER ID: 831073

OFFICER: Josh Zuerner

TITLE: President & CEO

I, Josh Zuerner, hereby certify that I am an officer of Joink, LLC ("Joink, LLC") and that I am authorized to make this certification on behalf of Joink, LLC. I have personal knowledge that Joink, LLC has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Joink, LLC or to any of the information obtained by Joink, LLC. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Joink, LLC employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Joink, LLC or to the information obtained by Joink, LLC.

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



On behalf of Joink, LLC

Date: February 28, 2018