

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2018**

Date Filed: 3/14/2018

Name of company covered by this certification: A+ Conferencing LTD.

Form 499 Filer ID: 827276

I, Michael Burns, 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 (Attachment A) 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 any actions (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. A+ does not have any information outside of the publicly available information in this docket regarding the steps pretexters are using to gain access to CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

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 are punishable under Title 18 of the U.S. Code and may be subject to an enforcement action.

Signed: 
Michael Burns
President

ATTACHMENT A

A+ Conferencing CPNI Procedure Summary

A+ Conferencing exclusively provides audio bridge conferencing services to requesting customers. A+ Conferencing has established policies and procedures that are designed to ensure that it is in compliance with the Federal Communications Commission's ("Commission") rules regarding the use, disclosure, and access to CPNI. A+ provides this statement summarizing those procedures in accordance with section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e).

CPNI Certification: A+ has appointed an officer who is responsible for overseeing the company's compliance with the FCC's CPNI rules. The officer will ensure that the company files an annual CPNI certification.

Permissible Uses of CPNI: A+ is committed to protecting its customers' privacy, and it limits the situations in which CPNI may be used, access, and/or disclosed. In accordance with the Commission's rules, A+ may use CPNI for the following purposes: (1) to initiate, provide, render, and bill and collect for the telecommunications services from which such information is derived; (2) to provide the services necessary to, or used in, the provision of the services that A+ provides to its customers; (3) to market services to customers within the category of service to which the customer already subscribes; and (4) to protect our rights and property, or to protect our customers and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, our services. We also may use CPNI to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if the customer initiated the call and approves of the use of such information to provide services.

A+ has implemented protections, such as contractual protections, to protect against unauthorized disclosure or access to CPNI in the limited instances where it is required to share or disclose CPNI with third parties, such as for billing and collection.

Employee Training: A+ trains its personnel regarding when they are and are not permitted to use, disclose, and/or permit access to CPNI. A+ has an express disciplinary process in place for the misuse of CPNI, which includes the potential for termination.

Customer Access to CPNI: A+ does not disclose call detail information over the phone during an in-bound call. A+ has implemented protections for online customer account access.

Use of CPNI for Marketing Purposes: A+ currently does not use CPNI to market outside of the category of service to which the customer subscribes. If A+ subsequently determines that it wants to use CPNI for marketing purposes, then it will provide the appropriate customer notification. A+ also will maintain a list of customers that wish/do not wish to receive marketing communications from the company, and will track its campaigns in accordance with the FCC's rules. A+ currently does not share CPNI with joint venture partners or independent contractors for marketing purposes.

CPNI Safeguards: A+ has instituted procedures to safeguard CPNI. Among other procedures, A+ has implemented procedures to authenticate its customers during an in-coming

telephone call. A+ also has implemented password protection for online accounts, and has procedures in place for lost or stolen passwords.

A+ has implemented network security measures, including, but not limited to, the use of encryption, SSL, and password protection.

A+ has implemented procedures for notifying customers of certain account changes, including, changes in online passwords, changes to online accounts, changes to a back-up means of authentication, and changes to the address of record.

Data Breaches: A+ will notify law enforcement within seven days of the reasonable discovery of a data breach involving CPNI. A+ also will notify affected customers as permitted to do so by law. A+ will maintain a record of such notifications in accordance with applicable law.

A+ also is mindful of attempts by pretexters to gain access to CPNI, and will report on any such attempts/methods that pretexters are using when it files its annual CPNI certification.

Customer Complaints: A+ tracks customer complaints it receives regarding CPNI. A+ will report on those complaints in its annual CPNI certification.