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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017 covering the prior calendar year 2016

1. Date filed: 3/1/2017
2. Name of company(s) covered by this certification: ValuTel Communications, Inc.
3. Form 499 Filer ID: 823616
4. Name of signatory: Tim Keefer
5. Title of signatory: President
6. Certification:

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I, Tim Keefer, 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.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, 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

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

Signed _____ Tim Keefer, President

ATTACHMENT 1

Customer Proprietary Network Information (CPNI)

Compliance Procedures

ValuTel Communications, Inc. ("ValuTel") has established and implemented the following internal policies and procedures that ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended, and with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), codified at 47 C.F.R. § 64.2001 *et seq.*

The following operating procedures ensure that ValuTel is in compliance with the FCC's CPNI Rules:

ValuTel does not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by law.

ValuTel only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. ValuTel does not use its customers' CPNI for any marketing purpose, either internal or external, or other purpose set forth in the FCC's CPNI Rules, 47 C.F.R. § 64.2001 *et seq.*

ValuTel has practices and procedures that govern the disclosure of CPNI:

a. ValuTel does not disclose or release CPNI upon a customer's telephone request

b. ValuTel does not disclose or release CPNI through online access over the Internet.

c. ValuTel does not have any retail locations where a customer can obtain CPNI.

d. With respect to telephone inquiries by customers concerning specific call-related issues, ValuTel requires the customer to provide sufficient specific information about the call in question to confirm the customer's identity.

e. ValuTel automatically notifies customers (at the customer's original telephone number or address on file) in case any changes are made to the customer's primary account information.

f. ValuTel is prepared to notify the required U.S. government agencies in the event of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach.

ValuTel provides training to all relevant employees on the company's practices and procedures that protect CPNI and its misuse.

It is a violation of ValuTels' policies to disclose CPNI outside of ValuTel. Any employee that is found to have violated this policy will be subject to disciplinary action up to and including termination.

Access to CPNI at ValuTel is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures which prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically.

Strict controls are in place involving responses to law enforcement agencies that serve ValuTel with valid legal demands, such as a court ordered subpoena, for CPNI. ValuTel will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.

ATTACHMENT 2

No customer complaints have been made.

ATTACHMENT 3

47 C.F.R. § 64.2009 Safeguards required for use of customer proprietary network information.

(a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

(b) Telecommunications carriers must train their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.

(c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

(e) A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.

(f) Carriers must provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(1) The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission (s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2) Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.