



Greenfly Networks Inc. dba Clearfly Communications

May 1st, 2018

Marlene H. Dortch,
Office of the Secretary, Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36**

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

Date filed: 5/8/2018

Name of company covered by this certification: Greenfly Networks Inc. dba Clearfly Communications

Form 499 Filer ID: 826830

Name of signatory: Tim Dodge

Title of signatory: VP

I, Tim Dodge, 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 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.

Signed 

Tim Dodge, VP



Greenfly Networks has implemented the following safeguards to ensure compliance with the commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq. These safeguards have been in place since Greenfly Networks first began providing services to customers in January 2008.

1. Implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Our service agreement specifically requires customers opt in to allow Clearfly to share CPNI with our partners and contractors. Customer's opt-in status is clearly recorded in our CRM and made available to all Greenfly employees.
2. Our personnel has been trained on when they are and are not authorized to use CPNI. Dates of training sessions and individuals trained have been recorded in a log. CPNI rules have been prominently posted around the office in areas of high traffic.
3. Our customers are exclusively small/medium businesses (Greenfly Networks does not provide services to residential users). Customers requesting service over the phone are serviced by dedicated account representatives as their primary contacts and our Master Services Contract specifically discusses the protection of CPNI.
4. An express disciplinary process is in place for those personnel that violate CPNI policies.
5. No marketing campaigns that used CPNI were carried out in the course of 2017.
6. A supervisory review process regarding our compliance with the rules for outbound marketing situations has been put in place and we maintain records of our compliance for a minimum of one-year.
7. Specifically, sales and marketing personnel must obtain supervisory approval of any proposed outbound marketing campaign.