

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification

Date filed: May 2018

Name of company: Telia Carrier U.S. Inc. (f/k/a TeliaSonera International Carrier Inc.)

Form 499 Filer ID: 820086

Name of signatory: Brian McHugh

Title of signatory: Secretary

I, Brian McHugh, 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. Moreover, the company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: Brian McHugh
Brian McHugh for
Telia Carrier U.S. Inc.

Attachment

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**TELIA CARRIER U.S. INC. ("TELIASONERA INTERNATIONAL
CARRIER, INC.)
POLICY REGARDING THE USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)
Ref. EB Docket 06-36**

The following operating procedures of Telia Carrier U.S. Inc. explain how customer proprietary information may be used:

1. Telia permits the use of CPNI to initiate, render, maintain, bill, and collect for telecommunications services.

2. Telia will allow customer information to be shared with affiliates for the purpose of initiating, rendering, maintaining, billing and collecting for service. Telia also will allow CPNI to be shared with interconnecting carriers to the extent required to provide service.

3. Telia permits the use of CPNI for the purpose of providing or marketing service offerings among the categories of service in which the customer already receives a service from Telia, without customer approval. For example, if Telia provides a customer with international wholesale voice services, the company may use the information about how the customer is using the service to sell more of the same service to the customer.

4. Except as set forth above, Telia does not permit the use, disclose, or provide access to CPNI for the purpose of selling, marketing or promoting service offerings. Telia may still use readily available information concerning customers and potential customers to market services.

5. All marketing campaigns will not use CPNI and must be authorized by the Legal Department to ensure that they comply with the FCC's rules.

6. All employees must treat CPNI as confidential. Telia also signs non-disclosure agreements with its customers and these further obligate Telia to maintain the confidentiality of information gained during the course of a business relationship. Employees do not release information to third-parties concerning customers and are instructed not to do so and to abide by the terms of non-disclosure agreements signed with customers. If anyone receives an inquiry from a third-party seeking customer information, then this should be reported to the employee's direct manager or to the Legal Department.

7. Telia will cause an officer to execute and submit a compliance certificate on an annual basis stating that the officer has personal knowledge that the company is in

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compliance with the Commission's rules governing the use of CPNI as set forth in 47 C.F.R. Subpart U.

8. Telia will deal with any instances involving the unauthorized use or disclosure of CPNI on an individual case basis, taking into account the circumstances surrounding the disclosure.

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