



February 16, 2015  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

RE: InterGlobe Communications  
EB Docket No. 06-36; CY2014

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2014 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of the InterGlobe Communications.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Carey Roesel

Carey Roesel  
Consultant to InterGlobe Communications

cc: Al Mayerhoff - Interglobe  
file: Interglobe - FCC CPNI  
tms: FCCx1501

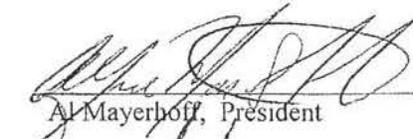
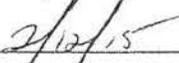
Enclosures  
CR/gs

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015:                      Covering calendar year 2014  
Name of company(s) covered by this certification:                InterGlobe Communications  
Form 499 Filer ID:    821422  
Name of signatory:   Al Mayerhoff  
Title of signatory:   President

1. I, Al Mayerhoff, 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.*
2. 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 §64.2001 *et seq.* of the Commission's rules.
3. 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.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. 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.

  
\_\_\_\_\_  
Al Mayerhoff, President  
  
\_\_\_\_\_  
Date

**Attachments:**            Accompanying Statement explaining CPNI procedures

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

## Statement of CPNI Procedures and Compliance

### **USE OF CPNI**

InterGlobe Communications ("InterGlobe") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. InterGlobe has trained its personnel not to use CPNI for marketing purposes. Should InterGlobe elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

### **PROTECTION OF CPNI**

InterGlobe has put into place processes to safeguard its customers' CPNI/call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Should a customer call in requesting information who is not the recognized and authorized contact on the account, InterGlobe requires the request to be in writing and transmitted via fax. Once received, it is determined if the fax belongs to the customer, and the company will call the customer back at the number of record with the requested information.

Although it has never occurred, InterGlobe will maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

### **DISCLOSURE OF CALL DETAIL OVER PHONE**

Company does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

Company has put into place procedures to notify customers whenever an online account or address of record is created or changed without revealing the changed information or sending the notification to the new account information. This notification is made via telephone call to the customer's number of record.

## **DISCLOSURE OF CPNI ONLINE**

InterGlobe has instituted authentication procedures to safeguard the disclosure of CPNI on-line. InterGlobe's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Customers wishing to have online access to billing information are required to establish a password and security question, without the use of readily available biographical information or account information, at the time of account set up. Unless the appropriate password is provided, InterGlobe does not allow on-line access to CPNI.

InterGlobe has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. If the security question is answered correctly, a new password can be established. If this fails, InterGlobe will call the customer back at the number of record before providing a password reset.

## **DISCLOSURE OF CPNI AT RETAIL LOCATIONS**

InterGlobe does not disclose CPNI at any retail locations.

## **NOTIFICATION TO LAW ENFORCEMENT**

Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

Although it has never occurred, InterGlobe will maintain records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

## **ACTIONS AGAINST DATA BROKERS**

Company has not taken any actions against data brokers in the last year.

## **CUSTOMER COMPLAINTS ABOUT CPNI BREACHES**

Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2014.

## **INFORMATION ABOUT PRETEXTERS**

Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to diligently protect CPNI.