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

Annual 64.2009(e) CPNI Certification for:	2015 Covering Prior Calendar Year 2014
Date filed:	1/26/15
Name of company covered by this certification:	Iron Bow Technologies, LLC
Form 499 Filer ID:	830467
Name of signatory:	Charles Curran
Title of signatory:	CFO

I, Charles Curran, certify that I am an officer of Iron Bow Technologies, LLC (the company named above, herein referred to as "the company"), 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. S: 64.2001 et seq., which is a subpart to implement **section 222 of the Communications Act of 1934 as amended, 47 U.S.C. 222**.

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. See attached accompanying statement for details.

The company **has not had to taken any actions** in the form of proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers against in the past year.

The company understands that it must report on any information that it has with respect to the processes pretexters are using to attempt to access CPNI, and what steps the company is taking to protect CPNI.

Note, the company recognizes "pretexting" as **"the process in which personal information is obtained by fraudulent means including identity theft, selling personal data for profit, or using some other method for snooping for information whose release was not authorized by the owner of the information. See attached accompanying statement for details on how the applicant guards CPNI data against pretexting.**

Signed X _____ [signature]

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI and the company has received **0** number of customer complaints received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint as follows:

(1). Instances of improper access by employees: **0 complaints**

(2). Instances of improper disclosure to individuals not authorized to receive the information: **0 Complaints**

(3). Instances of improper access to online information by individuals not authorized to view the information). **0 Complaints**

If it was affirmative, above, the company would have provided summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.

The company is aware of "Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007)("EPIC CPNI Order"). See 47 U.S.C. S: 222".

The company understands "47 C.F.R. S: 64.2009(e) in that it states:

(1). "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.

(2). That 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.

(3). That the carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart.

(4). That 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.

(5). That 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."

Signed X _____ [signature]

Attached Accompanying Statement

The following are the measures put in place by the carrier (herein referred to as "the company") to protect CPNI from pretexting. The company understands that the three common types of "pretexting" are **identity theft**, **selling personal data for profit without authorization by the owner** or **using some other method for snooping for information whose release was not authorized by the owner of the information**.

I. Pretexting via identify theft

(A). Identify theft via theft of physical hardware containing CPNI Data

Guarding Measures:

The company utilizes physical security such as locks and security surveillance to protect physical hardware and limits physical access to authorized personnel. Also, certain portable hardware such as laptops have security features that provide additional security.

(B). Identify theft via hacking/virtual intrusion of systems that carry CPNI

Guarding Measures:

The company utilizes security software to detect and prevent unauthorized access via hacking and other virtual methods.

II. Pretexting via some other method for snooping for information whose release was not authorized by the owner

(A). Snooping via social engineering/ impersonation/false identification

Guarding Measures:

The company's customer service personnel (*the individuals most likely to be the targets of social engineering*) have specific policies that they must follow to identify that they are in contact with the owner of the CPNI data prior to discussing or revealing CPNI.

(B). Snooping by personnel not authorized to access data

Guarding Measures:

The company limits access of CPNI to authorized personnel only.

III. Pretexting by selling CPNI for profit without authorization by the owner

(A). Selling CPNI data by the company with other companies

Guarding Measures:

The company does not share CPNI data with other companies for marketing and profit purposes.

(B). Sharing CPNI data for profit/marketing purposes by the company with sister companies, subsidiaries, parent companies or joint venture entities

Guarding Measures:

See page 4 to 8 for details (items 1 to 18).

Attached Accompanying Statement

The following items (1) to (18) are how the company guards CPNI against pretexting in the form of selling CPNI for profit or marketing purposes by the company to its sister companies, subsidiaries, parent companies or joint venture entities but without authorization by the owner. In the event that the company was to sell or share CPNI with its affiliated entities for marketing or profit purposes, it would strictly abide by the following policies in compliance with FCC rules as outlined in section 222 of the Communications Act of 1934 as amended, 47 U.S.C. 222 (47 C.F.R. S: 64.2001 to 64.2011 et seq.).

How The Company Complies with 47 C.F.R. S: 64.2001-64.2011 et seq.

(1). The company does not enable use, disclosure or permit access to CPNI for any marketing purposes to any persons, entities parties outside of the company without the specific consent of the customer that owns the CPNI data.

(2). If the company wishes to share CPNI with any subsidiaries or parent companies of the company and the customer only subscribes to only 1 category of service offered by the company, the company will secure the consent of the customer prior to sharing that CPNI data with subsidiaries or parent companies of the company.

(3). In most cases, the company will go a step above and try to secure the consent of the customer to share CPNI data with subsidiaries and parent companies of the company, regardless of whether customer subscribes to 1 or more than 1 type of service offered by the company.

(4). The company will not utilize, disclose or permit access to CPNI data to identify or track customers that call competing service providers.

(5). If the company requires customer consent for utilizing, disclosing or permitting access to CPNI data, the company will obtain consent through written, oral or electronic methods.

(6). The company understands that carriers that rely on oral approval shall bear the burden of proving that such approval has been given in compliance with the Commission's rules.

(7). The company has a policy in which any customer approvals obtained for the use, disclosing or utilization of CPNI data will remain in effect until the customer revokes or limits such approval or disapproval.

Attached Accompanying Statement

(8). For all Opt-Out and Opt-In Approval Processes utilized by the Company in which the CPNI data is used for marketing communications related services to that customer, the company will make that customer's data individually identifiable to the customer and state the specific marketing purpose that CPNI would be utilized.

(9). Prior to any solicitation of the customer for approval, the company provides notification to the customer of the customer's rights to restrict to use of, disclosure of, and access to that customer's CPNI.

(10). The company maintains records of notification, whether oral, written or electronic, for at least one year. The company provides individual notices to customers when soliciting approval to use, disclose or permit access to customer's CPNI.

(11). In cases where the company requests CPNI release requests from the customer, the company includes the following in its **"Consent of Notice"**

I. Sufficient information to enable the customer to make an informed decision as to whether to permit the company to use, disclose or permit access to, the customer's CPNI.

II. Statement declaring that the customer has a right, and that the company has the duty, under federal law, to protect the confidentiality of CPNI.

III. Specific statement on that the types of information that constitute CPNI (**as defined in 64.2001**) and the specific entities that will receive the CPNI, describing the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at anytime.

IV. Statement advising the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and clear statement that a denial of approval will not affect the provision of any services to which the customer subscribes. The company also provides a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI. The company's notification will be comprehensible and not be misleading.

Attached Accompanying Statement

(11). ***"Consent of Notice" (continued from page 4...)***

V. In cases where the company utilizes written notification, the notice will be clear, legible, sufficiently large type and be placed in an area so as to be readily apparent to a customer.

VI. In the event that the notification is to be translated into another language, then all portions of the company's notification will be translated into that language.

VIII. The company will not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

IX. The notification will state that any approval, or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from the company is valid until the customer affirmatively revokes or limits such approval or denial.

X. The company's solicitation for approval will state the customer's CPNI rights (defined in **47 C.F.R. S: 64.2001 to 64.2011 et seq.).**

(12). All of the company's notices specific to Opt-Out option will be provided via electronic or written notification. The company will not utilize purely oral notification.

(13). The company must wait a minimum of 30 days after giving customer notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. The company may, in its discretion, provide for a longer period for notification and opportunity for opt-out option. The company does notify customers as to the applicable waiting period for response before approval is assumed. The company also abides by the following as far as minimum waiting period.

I. In cases where the company utilizes electronic notification, the Company's waiting period begins to run from the date that the notification was mailed.

II. In the case of notification by mail, the waiting period shall begin to run on the third day following the date that the notification was mailed.

(14) The company's opt-out mechanism will provide notices to the customer every two years.

Attached Accompanying Statement

(15) The company's e-mail based opt-out notices will comply with the following requirements in addition to the requirements generally applicable to notification:

I. The company will obtain express, verifiable, prior approval from the customer to send notices via e-mail regarding their service in general, or CPNI in particular.

II. The company will allow customers to reply directly to e-mails Containing CPNI notices in order to opt-out.

III. Opt-out e-mail notices returned to the company as undeliverable must be sent to the customer in another form before the company may consider the customer to have received notice.

IV. Carriers that use e-mail to send CPNI notices must ensure that the subject line of the message clearly and accurately identifies the subject matter of the e-mail.

V. Telecommunications carriers must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. Carriers may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

16. In terms of the company's Opt-in method, the company will provide notification to obtain opt-in approval through oral, written or electronic methods, with all such methods complying with applicable items listed prior in this attachment.

17. In One-Time Use of CPNI, the customer recognizes that it may use oral notices to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether the company use opt-out or opt-in approval based on the nature of the contact. However, the company will not utilize oral consent and as such, will utilize either written or electronic notification and consent methods.

Attached Accompanying Statement

18. The company will ensure that all notifications will comply with the requirements listed above but recognizes that under FCC CPNI rules enable the company to omit any of the following notice provisions if not relevant to the limited use for which the company seeks CPNI:

    I. Under the applicable FCC CPNI rules, The company recognizes that it will not need to advise customers that if they opted-out previously, no action is needed to maintain the opt-out election.

    II. The company also recognizes that it need not advise customers that they may share CPNI with the affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party;

    III. The company recognizes that it need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as the company explains to customers that the scope of the approval the carrier seeks is limited to one-time use.

    IV. The company recognizes that it may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as the company clearly communicates that the customer can deny access to his CPNI for the call.