

## **IKN, Incorporated**

### **Statement of CPNI Procedures and Compliance**

IKN, Incorporated ("IKN") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, IKN does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. IKN does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The company provides service only to other carriers. IKN typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service.

IKN may obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because IKN provides exclusively carrier-to-carrier services, it does not use any call detail information that it obtains in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers.

Moreover, the call detail information obtained by IKN is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

IKN safeguards from improper use or disclosure by employees the call detail information that IKN obtains in providing its carrier-to-carrier services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, IKN has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to IKN computers and call detail records. In the event of unauthorized CPNI access, IKN will notify the requisite law enforcement agencies, and the customer when possible.

IKN did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because IKN does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through IKN, it cannot notify those end-user customers directly if a breach occurs. However, IKN has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than information that has been publicly reported, regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

**IKN, Incorporated**  
**Annual CPNI Certification**  
**47 C.F.R. § 64.2009(e)**  
**EB Docket No. 06-36**

COMPANY NAME: IKN, Incorporated  
REPORTING PERIOD: January 1, 2014 - December 31, 2014  
FILER ID: 828005  
OFFICER: Scott Kaye  
TITLE: President

I, Scott Kaye, hereby certify that I am an officer of IKN, Incorporated ("IKN") and that I am authorized to make this certification on behalf of IKN. I have personal knowledge that IKN has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to IKN or to any of the information obtained by IKN. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures IKN employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to IKN or to the information obtained by IKN.

Signed:  \_\_\_\_\_

On behalf of IKN, Incorporated

Date: 2/26/15