

Annual 47 C.F.R. § 64.2010(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for [2014]

Date filed: [February 27, 2015]

Name of company covered by this certification: [SmartLine, LLC]

Form 499 Filer ID: [826580]

Name of signatory: [Wolfgang Lant]

Title of signatory: [Partner]

I, [Wolfgang Lant], 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 [attach accompanying statement].

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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative: [Provide explanation of any actions taken against data brokers]

The company [has not] received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative: [Provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.]

Signed Wolfgang Lant [electronic signature]

Please see our attached Operating Procedures for CPNI Compliance.

SmartLine, LLC Operating Procedures for CPNI Compliance

- 1) SmartLine, LLC is a small VoIP telephone provider with about 100 customers consisting of both individuals and small companies.
- 2) No one has requested proprietary account information from SmartLine, LLC of any kind this year, nor has SmartLine, LLC ever disclosed proprietary account information to anyone other than the client for any reason.
- 3) Should such an event ever occur, a customer requesting any proprietary account information must first identify their name, company name (if applicable), phone number, extension number and a unique proprietary password assigned to each account.
- 4) Once a customer has uniquely identified themselves and given the correct password for their specific account, SmartLine, LLC still will not release any customer proprietary network information over the telephone. Any request for account information will be sent via regular mail or fax to the primary contact for that account and only to the address or fax number of record for that customer. If a properly identified customer provides us a call detail incident that they request us to investigate for trouble shooting purposes, we will discuss only that call incident with the customer in order to remedy the problem.
- 5) There is currently no provision for online customer account CPNI access of any kind.
- 6) There have been no breaches of CPNI information to any outside entities to date.
- 7) There have been no customer complaints concerning unauthorized CPNI to date.
- 8) We may disclose CPNI information to a customer who requests it at our office in person, but only after verifying a valid photo ID (drivers license or state issued ID) matching the customer account information on record and matching the appropriate password.
- 9) We have never used CPNI for marketing purposes of any kind. All customers will be asked for opt in or opt out approval to use their individual CPNI prior to any future marketing campaigns.
- 10) SmartLine, LLC has two employees and one partner. All three people have received a copy of the FCC Small Entity Compliance Guide (DA 08-1321) and have been trained as to when they are, and are not

authorized to use a Customer's Proprietary Network Information. They are all aware that a breach of this authorization is cause for immediate disciplinary action including possible dismissal and termination.

- 11) Employee(s) are aware that any breach of customer CPNI must be brought to the immediate attention of their manager who must notify law enforcement and the customer per approved procedures.
- 12) Customers will be immediately notified of any change in account information including password, address or primary contact information. This notification will not reveal the changed information or be sent to the new account information.