

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2014.

Date certified: February 25, 2015

Name of company covered by this certification: Telecom North America, Inc., plus all subsidiaries

Form 499 Filer ID: 822276

Name of signatory: Jean Gottschalk

Title of signatory: President

I, Jean Gottschalk, 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.*

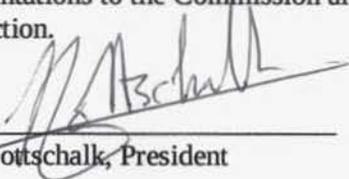
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

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.

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).

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.

Signed _____


Jean Gottschalk, President

TELECOM NORTH AMERICA, INC.

STATEMENT OF CPNI COMPLIANCE PROCEDURES

Telecom North America, Inc. and its subsidiaries ("Tel-NA") maintain CPNI in the following databases and record systems: billing system and PDFs of invoices. Each of these systems is protected against unauthorized access by log-in and password procedures. The company does not use paper records.

Tel-NA has established operating procedures whereby personnel who are authorized to access CPNI are trained in the authorized uses of this information. All Tel-NA employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by Tel-NA. Pursuant to these procedures, any employee who violates the authorized procedures for access to this information is subject to discipline, up to and including termination of employment.

Tel-NA does not share CPNI with any joint venture partner or independent contractor. If Tel-NA were to share CPNI with any joint venture partner or independent contractor, Tel-NA would first establish an opt-in approval

procedure.

At this time, Tel-NA does not engage in any sales and marketing campaigns that use CPNI. Tel-NA has established operating procedures to maintain a record of any and all future sales and marketing campaigns that would use CPNI. Pursuant to these procedures, the records of any such hypothetical campaigns shall be maintained by the President and shall be maintained for at least one year. Since Tel-NA does not engage in any marketing activities where customer approval would be required, Tel-NA does not maintain a database of opt-out approvals at this time.

At this time, Tel-NA does not engage in any outbound marketing activities.

In accordance with the CPNI rules, upon obtaining a customer's oral authorization, customer service representatives of Tel-NA may access a customer's CPNI during the course of an inbound or outbound telephone conversation, solely for the duration of that conversation. Each such Tel-NA representative must provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

Tel-NA may, as permitted by the CPNI rules, use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of Tel-NA, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

Tel-NA has established procedures to require a password prior to disclosing call detail information or other CPNI to a customer during a customer-initiated call. Tel-NA does provide online account access on its secured website, which requires each customer to login with a private password prior to accessing CPNI information. Tel-NA will also provide call detail information to a customer by mailing such information to the address of record if the customer is unable to present a proper password. Tel-NA does not maintain any retail locations.

Tel-NA has procedures for customer establishment of a password during the signup procedure.

Tel-NA has established procedures for notifying the United States Department of Justice in the event of a breach of CPNI protection within seven days of reasonably determining that there has been a breach. Customer notification shall be delayed for a minimum of seven full business days after notification to the DOJ. Tel-NA has established procedures for maintaining records of such breaches for a minimum of two years.