

R Squared Telecom LLC

Statement of CPNI Procedures and Compliance

R Squared Telecom LLC ("R Squared Telecom") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, R Squared Telecom does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. R Squared Telecom 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. R Squared Telecom 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.

R Squared Telecom may obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because R Squared Telecom 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 R Squared Telecom 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.

R Squared Telecom safeguards from improper use or disclosure by employees the call detail information that R Squared Telecom 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, R Squared Telecom has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to R Squared Telecom computers and call detail records. In the event of unauthorized CPNI access, R Squared Telecom will notify the requisite law enforcement agencies, and the customer when possible.

R Squared Telecom 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 R Squared Telecom does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through R Squared Telecom, it cannot notify those end-user customers directly if a breach occurs. However, R Squared Telecom 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.

R Squared Telecom LLC

Annual CPNI Certification

47 C.F.R. § 64.2009(e)

EB Docket No. 06-36

COMPANY NAME: R Squared Telecom LLC

REPORTING PERIOD: January 1, 2014 - December 31, 2014

FILER ID: 830418

OFFICER: Ryan Krakower

TITLE: Partner

I, Ryan Krakower, hereby certify that I am an officer of R Squared Telecom LLC ("R Squared Telecom") and that I am authorized to make this certification on behalf of R Squared Telecom. I have personal knowledge that R Squared Telecom 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 R Squared Telecom or to any of the information obtained by R Squared Telecom. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures R Squared Telecom 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 R Squared Telecom or to the information obtained by R Squared Telecom.

Signed:



On behalf of R Squared Telecom LLC

Date: February 27, 2015