

**Seawolf Technologies, Inc.**

6800 Jericho Turnpike, Suite 130W  
Syosset, NY 11791

March 2, 2015

VIA ECFS

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

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

Dear Ms. Dortch:

Seawolf Technologies, Inc. hereby submits its Annual CPNI Certification and accompanying statement of compliance for FY 2014, in EB Docket No. 06-36.

If you have any questions about this filing, please contact us.

Sincerely,

[electronic signature]  
Xiaodan Lu  
President

**Annual 47 C.F.R. S: 64.2009(e) CPNI Certification for Fiscal Year 2014**

**EB Docket 06-36**

Date filed: March 2, 2015

Name of company covered by this certification: Seawolf Technologies, Inc.

Form 499 Filer ID: 822006

Name of signatory: Xiaodan Lu

Title of signatory: President

I, Xiaodan Lu, 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. S: 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 against data brokers in the past year. I acknowledge that 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, and I do not have any evidence nor information that pretexters have attempted to access CPNI in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI and I acknowledge that if the company does receive any such complaints, it must provide that information to the Commission.

[electronic signature]

Signed: Xiaodan Lu

Title of signatory: President

**Annual 47 C.F.R. S: 64.2009(e) CPNI Certification for Fiscal Year 2014**

**EB Docket 06-36**

**Seawolf Technologies, Inc.**

**Filed: March 2, 2015**

**Statement of CPNI Procedures and Compliance for Fiscal Year 2014**

Seawolf Technologies, Inc. (the "Company") is a provider of wholesale long distance services to other registered carriers and also Prepaid Calling Card Provider to the public. The Company does not use, disclose or permit access to Customer Proprietary Network Information ("CPNI") except as permitted or required by law pursuant to 47 U.S.C. § 222. The safeguards set forth in Sections I and J below are followed by the Company, and, to the extent that the Company finds it necessary to use, disclose or permit access to CPNI, the operating procedures in Sections A-H below are observed.

A. Definitions. The terms used in this Statement have the same meaning as set forth in 47 C.F.R. §64.2003.

B. Use of CPNI.

As a provider of wholesale long distance services to other registered carriers, Company generally does not have access to customer information such as name, address, and other personal information. Company's access to CPNI is limited to Call Detail Records and other data collected by its switches, which is minimal since there is no personal customer information to relate to.

As a prepaid calling card provider, the Company does not have access to personally identifiable CPNI. Prepaid services customers do not "subscribe" to the services of the Company in the same manner as customers of non-prepaid service providers; rather, these customers decide for themselves if they will use the company's services. These customers do not receive bills from Company. Company does not have information concerning the quantity, technical configuration, type, destination, location, or amount of use of telecommunications services which can be associated with any individual customer. Indeed, because the company's prepaid services may lawfully be utilized by any authorized user of the purchaser, Company has no means of identifying the particular individual which has placed any particular call.

Nevertheless, Company has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI and, furthermore, the company has distributed a CPNI compliance policy to all of its employees. Company does not release or distribute CPNI to unauthorized individuals; neither does Company use CPNI in violation of Section 64.200 *I et seq.* of the FCC's Rules. To the extent Call Detail Records ("CDRs") exist, they are not associated with any individually identifiable customer and do not constitute CPNI. To the extent that such CDR information exists in paper, removable magnetic or optical form, it is maintained by Company in a secure

location which is not accessible by employees of Company without going through the company's established security procedures. When such information is maintained on a computer, the computer and/or the individual file is password protected.

As noted above, Company does not maintain CPNI in any manner which would give rise to the unauthorized disclosure of confidential information. Even in cases dealing with the limited information which is necessary to facilitate customer purchases of prepaid telecommunications services, Company takes steps prior to providing any requested information to assure itself that the individual making the request is authorized to obtain it.

Moreover, any call detail information obtained by Company 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. In the event of unauthorized CPNI access, Company will notify the requisite law enforcement agencies, and the customer when possible.

The Company has not taken any actions against data brokers in 2014.

Company did not have any breach of its call detail records during 2014 nor has the company received any customer complaints in 2014 concerning the unauthorized release of or access to CPNI.