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

Annual 64.2009(e) CPNI Certification for 2016

Date filed: January 9, 2016

Name of company(s) covered by this certification: Computer Telephony Innovations, Inc.

Form 499 Filer ID: 827574

Name of signatory: Patrick Burke

Title of signatory: President

I, Patrick Burke, 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 *etseq.*

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: No action.

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: No complaints.

Signed _____ [signature]

**Computer Telephony Innovations, Inc**

**STATEMENT EXPLAINING HOW THE COMPANY'S OPERATING PROCEDURES ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES**

**January 9, 2016**

**Prefatory Statement:**

Computer Telephony Innovations, Inc. has elected not to utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval in accordance with Section 64.2005 of the FCC's Rules and Regulations.

## I. Customer Proprietary Network Information ("CPNI")

The law affords privacy protections for two kinds of information related to Computer Telephony Innovations, Inc. as a telecommunications carrier: (1) information about the quantity, technical configuration, type, destination, location, and amount of a telecommunications service subscribed to by any customer, and (2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer.

That information, when matched to a name, address, and telephone number is known as "Customer Proprietary Network Information or "CPNI" for short. Examples of CPNI include information typically available from telephone-related details on a monthly bill such as the types of services purchased by a customer, numbers called, duration of calls, directory assistance charges, and calling patterns. (CPNI does not include names, addresses, and telephone numbers, because that information is considered subscriber list information under applicable law.

## II. Use of CPNI Is Restricted

Computer Telephony Innovations, Inc. recognizes that CPNI privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside our company.

Computer Telephony Innovations, Inc. has designated it's President as the CPNI Compliance Officer responsible for: (1) communicating with our company attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of company employees and agents who use or have access to CPNI; and

(3) receiving, reviewing and resolving any questions or issues arising within our company regarding use, disclosure, or provision of access to CPNI.

Company employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the company's CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

**III. Permissible Uses of CPNI**

Computer Telephony Innovations, Inc. employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside the company, except as follows:

1. Computer Telephony Innovations, Inc. may, after receiving an appropriate request from a customer, disclose or provide the customer's CPNI to any person or entity designated by the customer. Any and all such customer requests: (1) must be made in writing; (2) must include the customer's correct billing name and address and telephone number; (3) must specify exactly what type or types of CPNI must be disclosed or provided; (4) must specify the time period for which the CPNI must be disclosed or provided; and (5) must be signed by the customer.

2. In the absence of an appropriate written request from the customer, Computer Telephony Innovations, Inc. may still provide the customer's phone records or other CPNI to a law enforcement agency in response to a warrant or subpoena that specifies the particular CPNI to be furnished.

3. Computer Telephony Innovations, Inc. may use, disclose or permit access to CPNI to provide the same category of telecommunications service to a customer from which the CPNI is derived. For example, we may use the CPNI from our provision of long distance service to a customer to provide or market new, additional or modified long distance service offerings to the customer.

4. Computer Telephony Innovations, Inc. and its authorized employees may use, disclose or permit access to CPNI to provide services necessary to, or used in, the provision of the telecommunications service from which the CPNI is derived.

5. Computer Telephony Innovations, Inc., its authorized employees and its billing agent may use CPNI to initiate, render, bill and collect for telecommunications services.

6. Computer Telephony Innovations, Inc. may use CPNI to protect company rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived.

7. If a customer subscribes to more than one category of service offered by Computer Telephony Innovations, Inc., we are permitted to share CPNI among its affiliated entities that provide a service offering to the customer.

8. When an existing customer calls Computer Telephony Innovations, Inc. to inquire about or order new, additional or modified services (in-bound marketing), we may use the customer's CPNI to assist the customer for the duration of the customer's call if we provide the customer with the oral notice required by Sections 64.2008(c) and 64.2008(f) of the FCC's Rules.

9. Computer Telephony Innovations, Inc. has adopted a policy that it does not and will not use, disclose, or permit access to CPNI in connection with company-initiated marketing of services to which a customer does not already subscribe. (out-bound marketing).

**IV. CPNI Compliance Officer**

In addition to the specific matters required to be reviewed and approved by Computer Telephony Innovations, Inc.'s CPNI Compliance Officer, employees and agents are strongly encouraged to bring any and all other questions, issues or uncertainties regarding the use, disclosure, or access to CPNI to the attention of the our Compliance Officer for appropriate investigation, review and guidance. The extent to which a particular employee or agent brought a CPNI matter to the attention of the CPNI Compliance Officer and received appropriate guidance is a material consideration in any disciplinary action brought against the employee or agent for impermissible use, disclosure or access to CPNI.

**V. Disciplinary Procedures**

Computer Telephony Innovations, Inc. has informed its employees and agents that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important.

Violation by company employees or agents of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, probation, and termination), depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from the CPNI Compliance Officer, and the extent to which the violation was or was not deliberate or malicious).

Patrick Burke

President, Computer Telephony Innovations, Inc.