

ALLIANCE TELECOM INC

STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION

Set forth below is a statement summarizing the policies and procedures of ALLIANCE TELECOM INC ("Alliance Telecom") which ensure adequate compliance with the Federal Communications Commission's ("FCC") CPNI regulations. See 47 C.F.R. § 64.2001 et seq. Alliance Telecom provides telecommunications services exclusively on a prepaid basis.

As a prepaid services provider, the company does not have access to CPNI. Prepaid services customers do not "subscribe" to the services of Alliance Telecom 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 Alliance Telecom. Alliance Telecom 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 purchased services, Alliance Telecom has no means of identifying the particular individual which has placed any particular call.

Nevertheless, Alliance Telecom has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI and, furthermore, the company has informed its employees of the company's CPNI compliance policy. Alliance Telecom does not release or distribute CPNI to unauthorized individuals; neither does Alliance Telecom use CPNI in violation of § 64.2001 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 Alliance Telecom in a secure location which is not accessible by employees of Alliance Telecom 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, Alliance Telecom 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, Alliance Telecom 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 Alliance 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. In the event of unauthorized CPNI access, Alliance Telecom will notify the requisite law enforcement agencies, and the customer when possible.

Alliance 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 Alliance Telecom does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through Alliance Telecom, it cannot notify those end-user customers directly if a breach occurs. However, Alliance 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 publicly reported information regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

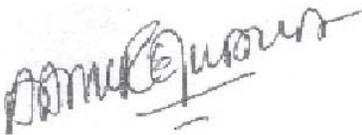
ALLIANCE TELECOM INC

Annual CPNI Certification 47 C.F.R. § 64.2009(e) EB Docket No. 06-36

COMPANY NAME: ALLIANCE TELECOM INC
REPORTING PERIOD: January 1, 2015 - December 31, 2015
FILER ID: 829407
OFFICER: AAMIR RETIWALLA
TITLE: Vice President

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

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



Signed:

On behalf of ALLIANCE TELECOM INC

Date: January 15, 2016