AvayaLive Inc.

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

COMPANY NAME: AvayaLive Inc.

FILER ID: 829275

OFFICER: Adele Freedman

TITLE: President and Secretary

I 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 Federal Communication 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.

AvayaLive 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 in the past year. The company has no information to report with respect to the processes pretexters are using to attempt to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized use of CPNI.

Signed: _____
On Behalf of AvayaLive, Inc.

Date: 2-16-16

AvayaLive Inc.

Statement of CPNI Compliance Measures

AvayaLive maintains and requires company and employee adherence to all applicable CPNI rules pursuant to a comprehensive internal CPNI Compliance Policies and Procedures Manual ("CPNI Manual"). This CPNI Manual contains sensitive information and therefore will be provided to the Federal Communications Commission ("FCC") upon request and subject to adequate protections from public disclosure.

In the CPNI Manual, the company adheres to all of the FCC's rules concerning the proper use and protection of our customer's CPNI, as stated in §§64.2001 - 64.2011. Furthermore, to further protect our customer's privacy (as well as the privacy of their customers), we have implemented all safeguards required in Section 64.2009, including:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
- The establishment of a password system allowing only authorized entities to access CPNI for their respective accounts.
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training.
- The implementation of an express disciplinary process for CPNI violations up to and including termination.
- The establishment of a supervisory review process regarding compliance with federal CPNI rules for outbound marketing situations, if the company uses CPNI in outbound marketing campaigns.
- The maintenance of a record, for at least one (1) year, of our own, and our affiliates' sales and marketing campaigns.
- The establishment of annual certification by a corporate officer with personal knowledge of the company's telecommunications policies and procedures to ensure compliance with the federal CPNI rules.
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms, do not work properly, to such a degree that a consumer's inability to opt-out is more than an anomaly.

AvayaLive remains strongly committed to securing the confidentiality of CPNI. AvayaLive reviews its CPNI policies and procedures on an on-going basis and periodically implements additional measures to further assist personnel in the performance of their duties in accordance with CPNI rules and regulations.

AvayaLive 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. AvayaLive has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement agencies 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.