NOWALSKY & GOTHARD
A Professional Limited Liability Company
Attorneys at Law
LEON L. NOWALSKY
EDWARD P. GOTHARD
1420 Veterans Memorial Blvd.
Metairie, Louisiana 70005
Telephone: (504) 832-1984
Facsimile: (504) 831-0892

February 17, 2016

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: Annual Customer Proprietary Network Information Compliance Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Please find attached the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification for Geotel Communications Services, Inc. Please feel free to call me if you have any questions regarding this filing.

Sincerely,

Leon L. Nowalsky

LLN/cdp

Attachment

STATEMENT OF POLICY IN TREATMENT OF
CUSTOMER PROPRIETARY NETWORK INFORMATION

1. It is Geotel Communications Services, Inc. ("Geotel") policy not to use CPNI for any activity other than permitted by law. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by the company to the customer. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the Company will first obtain the customer's consent prior to using CPNI.

2. Geotel follows industry-standard practices to prevent unauthorized access to CPNI by a person other that the subscriber or Geotel. However, Geotel cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:

   A. If an unauthorized disclosure were to occur, Geotel shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").

   B. Geotel shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.

   C. Notwithstanding the provisions in subparagraph B above, Geotel shall not wait the additional seven (7) days to notify its customers if Geotel determines there is an immediate risk of irreparable harm to the customers.

   D. Geotel shall maintain records of discovered breaches for a period of at least two (2) years.

3. All employees will be trained as to when they are, and are not, authorized to use CPNI upon employment with the Company and annually thereafter.

   A. Specifically, Geotel shall prohibit its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:

      1. When the customer has pre-established a password.

      2. When the information requested by the customer is to be sent to the customer's address of record, or

      3. When Geotel calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated.

B. Geotel may use CPNI for the following purposes:

- To initiate, render, maintain, repair, bill and collect for services;
- To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive , or the unlawful use of, or subscription to, such services;
- To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
- To market additional services to customers that are within the same categories of service to which the customer already subscribes;
- To market services formerly known as adjunct-to-basic services; and
- To market additional services to customers with the receipt of informed consent via the use of opt-in or opt-out, as applicable.

4. Prior to allowing access to Customers' individually identifiable CPNI to Geotel's joint venturers or independent contractors, Geotel will require, in order to safeguard that information, their entry into both confidentiality agreements that ensure compliance with this Statement and shall obtain opt-in consent from a customer prior to disclosing the information. In addition, Geotel requires all outside Dealers and Agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.

5. Geotel requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.

6. Geotel does not market, share or otherwise sell CPNI information to any third party.

7. Geotel maintains a record of its own and its affiliates' sales and marketing campaigns that use Geotel's customers' CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.

A. Prior commencement of a sales or marketing campaign that utilizes CPNI, Geotel establishes the status of a customer's CPNI approval. The following sets forth the procedure followed by Geotel.

- Prior to any solicitation for customer approval, Geotel will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
- Geotel will use opt-in approval for any instance in which Geotel must obtain customer approval prior to using, disclosing, or permitting access to CPNI.
- A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.

- Records of approvals are maintained for at least one year.
- Geotel provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI.
- The content of Geotel's CPNI notices comply with FCC rule 64.2008 (c).

8. Geotel has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.

9. Geotel has a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one year. Specifically, Geotel's sales personnel will obtain express approval of any proposed outbound marketing request for customer approval of the use of CPNI by The General Counsel of Geotel.

10. Geotel notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.

11. Geotel may negotiate alternative authentication procedures for services that Geotel provides to business customers that have a dedicated account representative and a contract that specifically addresses Geotel's protection of CPNI.

12. Geotel is prepared to provide written notice within five business days to the FCC of any instance where the opt-in mechanisms do not work properly to such a degree that consumer's inability to opt-in is more than an anomaly.

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

Annual 64.2009(e) CPNI Certificate for 2016

Date Filed: 2/18/16

Name of company(s) covered by this certification: Geotel Communications Services, Inc

Form 499 Filer ID: 825397

Name of signatory: George Amandola

Title of signatory: President

I, George Amandola, certify that I am an officer of the company named above, and acting as 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 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure 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 (proceedings instituted or petitions filed by any company at either state commissions, the court system, or at the Commission against date brokers) against data brokers in the past year. The steps the Company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designated to ensure compliance with the FCC's modified CPNI rules.

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

Signed George Amandola
GEORGE AMANDOLA