KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

NEW YORK, NY
LOS ANGELES, CA
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES
MUMBAI, INDIA

FACSIMILE
(202) 342-8451
www.kelleydrye.com

DENISE N. SMITH
DIRECT LINE: (202) 342-8614
EMAIL: dsmith@kelleydrye.com

February 26, 2016

VIA ECFS

Marlene H. Dortch
Office of the 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 Secretary Dortch:

On behalf of REACH Services USA, Inc. ("REACH") and pursuant to 47 C.F.R. § 64.2009(e), attached please find REACH's 2016 Annual Customer Proprietary Network Information compliance certification covering calendar year 2015.

Please contact the undersigned at (202) 342-8614 if you have any questions regarding this filing.

Respectfully Submitted,

Denise N. Smith

Counsel for REACH Services USA, Inc.

Attachment

Annual CPNI Certification for 2016 covering the prior calendar year 2015
Pursuant to 47 C.F.R. § 64.2009(e)
EB Docket No. 06-36
February 26, 2016

Name of Company Covered by this Certification: Reach Services USA, Inc.
Form 499 Filer ID: 822078
Name of Signatory: LARM Kang-Fong
Title of Signatory: Director

I, LARM Kang-Fong, certify that I am an officer of Reach Services USA, Inc. ("REACH"), and acting as an agent of REACH, that I have personal knowledge that REACH has established operating procedures 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 REACH's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, record keeping, and supervisory review) set forth in sections 64.2001 *et seq.* of the Commission's rules.

REACH has not taken any actions (i.e., 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.

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

LARM Kang-Fong
Director
REACH Services USA, Inc.

Date: 26 FEB 2016

Customer Proprietary Network Information Certification
Attachment A

REACH has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules, as modified by the Commission in 2007.

Safeguarding against pretexting

- REACH takes reasonable measures to protect CPNI and believes that these measures are sufficient to prevent unauthorized access to CPNI.

Training and discipline

- REACH has trained its personnel in the appropriate use of CPNI. All employees with access to CPNI are required to review REACH's CPNI manual. REACH employees are required to review REACH's CPNI practices and procedures set forth in REACH's CPNI manual.

- REACH has disciplinary process in place for violations of REACH's practices and procedures which would encompass any misuse of CPNI.

REACH's use of CPNI

- REACH does not share, disclose, or otherwise provide CPNI to any third parties.

- REACH 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;

- REACH does not disclose or permit access to CPNI to track customers that call competing service providers.

- REACH discloses and permits access to CPNI where required by law (*e.g.*, under a lawfully issued subpoena).

Customer approval and informed consent

- REACH does not use CPNI for any purpose that would require customer approval to do so. For example, REACH does not use CPNI for any marketing purposes and does not share, disclose, or otherwise provide CPNI to any third party. If this policy changes in the future, REACH will implement practices and procedures to ensure compliance with the Commission's CPNI regulations.

Additional safeguards

- REACH has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.

- REACH designates one or more officers, as an agent or agents of the company, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).

- REACH does not provide or disclose CPNI over the telephone or online, and REACH does not have any retail locations at which it might disclose CPNI to customers in person.

- REACH notifies customers immediately of any account changes.

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

- In the event of a breach of CPNI, REACH will notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs REACH to delay notification, or REACH and the investigatory party agree to an earlier notification. REACH will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.