

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 27, 2008

Name of company covered by this certification: Voicecom Telecommunications, LLC
d/b/a Intelliverse

Form 499 Filer ID: 823190

Name of signatory: Kevin Torf

Title of signatory: Chief Technology Officer

I, Kevin Torf, 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 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.

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.

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

Signed _____ /s/ Kevin Torf

CPNI Procedures

Voicecom Telecommunications, LLC d/b/a Intelliverse (“Voicecom”) has adopted and complies with the following operating procedures to protect the confidentiality of (1) information that relates to the quantity, technical configuration, type, destination, location, or amount of use of the telecommunications services to which its customers subscribe and (2) information contained in bills pertaining to telecommunications services that it provides to its customers (collectively, “Customer Proprietary Network Information” or “CPNI”) and to ensure that Voicecom complies with the Federal Communications Commission’s CPNI rules:

- Voicecom stores all CPNI on a secure computer network that is not accessible from the Internet.
- Voicecom does not use any CPNI for any marketing purpose.
- Voicecom does not use CPNI for any purpose other than (1) to provide the telecommunications service from which such information is derived, (2) to initiate, render, bill, and collect for such telecommunications services, and (3) to protect the rights or property of Voicecom, or to protect users of Voicecom’s services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.
- Except as provided in the immediately preceding paragraph, Voicecom does not release any CPNI to third parties for any purpose except in response to legal process.
- Voicecom does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.
- Voicecom does not release any customer’s CPNI to that customer except after positive confirmation of the customer’s identity.
- Voicecom provides periodic training to its employees concerning the importance of maintaining the confidentiality of its customers’ CPNI and the required procedures for ensuring compliance with the CPNI rules.
- Voicecom employees are subject to disciplinary action, including termination in appropriate cases, for violations of Voicecom’s CPNI confidentiality policy.
- Any use or release of any CPNI by any Voicecom employee requires the approval of a supervisor who is knowledgeable concerning Voicecom’s CPNI policies and the requirements of the CPNI rules.
- Voicecom requires all customers to use a password to access any CPNI. All passwords are encrypted and protected from any outside or inside attack.

- Voicecom requires each customer to identify himself or herself to an employee of Voicecom using information previously provided by the customer, such as shipping address, credit card number, or answer to secret question in order to reset their password in the event they have forgotten their password. Voicecom does not reset passwords based upon readily available biographical information or account information.
- Voicecom keeps logs of all transactions that impact CPNI either by the customer directly using a Voicecom portal or by a Voicecom employee.