

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

Annual 64.2009(e) CPNI Certification for 2007.

Date filed: March 3, 2008

Name of company covered by this certification: IJJ America, Inc.

Form 499 Filer ID: N/A (Company does not provide interstate telecommunications or interstate telecommunications service)

Name of signatory: Koichi Kobayashi

Title of signatory: President and CEO

I, Koichi Kobayashi, 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 小林 三郎
Koichi Kobayashi



Customer Proprietary Network Information

Purpose

The purpose of these procedures is to protect the confidentiality of proprietary information of carriers, vendors and customers.

Scope

These procedures apply to all personnel of IIJ America, Inc. ("IIJ America"), including all permanent and temporary employees, its subsidiaries, affiliates, and members of its Board of Directors, as well as its consultants, advisors, and contractors.

Definitions

Customer Proprietary Network Inform ("CPNI") means:

(a) Information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer or a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and

(b) Information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier.

IIJ America Service includes one category of service:

(a) Broadband transport over fiber optic cable, and/or

(b) Internet access over fiber optic cable.

Procedures

(a) CPNI may be released to contractors and/or vendors to provision IIJ America Service ordered by the customer or to install inside wire, maintain or repair IIJ America Service.

(b) CPNI will not be used for the purpose of marketing services, other than by affiliates of IIJ America when marketing IIJ America Service to an IIJ America customer. IIJ America will not use CPNI in any sales or marketing campaign. The President of IIJ America shall review all outbound marketing campaigns prior to implementation to insure compliance with these procedures.



(c) The IIJ America web site will not be used to collect personally identifying information. In particular, the web site will not be used to:

- Track, collect or record any information that can be used to identify an individual visitor at the IIJ America web site.
- Attempt to create marketing or email address lists from the email we receive.
- Participate in any data mining activities with other vendors.

IIJ America will not release any personally identifiable information to third parties for any reason. Additional information is included in the company's Acceptable Usage Policy that is included in our Customer Service Agreement.

Destruction of CPNI

Company records including CPNI shall be destroyed when no longer required. Paper records must be shredded. Electronic media shall be given to the Director, Network Operations for destruction.

Compliance

The issue of Confidentiality of information shall be discussed by supervisors with their direct reports and reinforced during periodic company-wide staff meetings. Employees must include "CONFIDENTIAL" on all documents that include CPNI.

It is the responsibility of all employees to comply with these procedures. Any deviation from this policy and its procedures may result in disciplinary action, up to and including termination of employment.

Advice and Counsel

The President of IIJ America shall provide advice and counsel regarding these procedures.

Reference

These procedures are required under Section 222 of the Communications Act of 1934 and Sections 64.2005 to 64.2009 of the Federal Communications Commission's rules.