

**Annual 47 C.F.R. § 64.2009 CPNI Certification**

**EB Docket No. 06-36**

Annual 64.2009(e) CPNI Certification for 2010

Date filed: February 28, 2011

Name of Company covered by this certification: VoIPStreet, Inc.

Form 499 Filer ID: 826554

Name of Signatory: Jason Tapolci

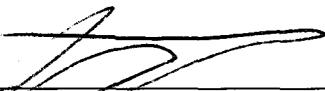
Title of Signatory: President

I, Jason Tapolci, certify that I am an officer of VoIPStreet, Inc., and acting as an agent of the company, I have personal knowledge that the company has established operating procedures to comply with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures comply with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

VoIPStreet, Inc. does not have knowledge of any data breaches from January 1, 2010, through December 31, 2010, that resulted in the unauthorized disclosure of CPNI. VoIPStreet, Inc. has not taking any actions against data brokers during the 2010 calendar year. VoIPStreet, Inc. has not received any complaints in the past year concerning the unauthorized release of CPNI. VoIPStreet, Inc. has not discovered any information about the processes that pretexters are using to attempt to gain access to CPNI, other than the publicly available information identified in this docket.

As mentioned in Attachment A, VoIPStreet has taken several measures to protect CPNI, including, without limitation, conducting training regarding the appropriate use of CPNI, developing customer verification processes, using security measures to protect CPNI including encryption, implementing and applying a CPNI program.

  
\_\_\_\_\_  
Jason Tapolci  
President  
February 28, 2011

## **Attachment A**

VoIPStreet, Inc. offers and provides voice over internet protocol (“VoIP”) services to business customers and wholesale providers. In order to protect customer proprietary network information (“CPNI”), VoIPStreet, Inc. has established policies and procedures that govern the use, disclosure, sharing, and access of CPNI. In accordance with section 64.2009(e), this statement is a summary of such policies and procedures.

### **Security.**

Through technological methods of encryption and internal security, VoIPStreet is currently using standard measures to protect against attempts to gain unauthorized access to CPNI. VoIPStreet has devised a method to track attempted access to CPNI. VoIPStreet has instituted customer verification methods and has limited employee or designated third party access to CPNI to a need-to-know basis.

### **Manual/Training**

VoIPStreet has created a manual to inform its employees as to the details of its CPNI policies and to assist the employees to protect CPNI. In particular, this document addresses topics including, but not limited to, the following:

- (a) The process for verifying a customer’s identity;
- (b) Which situations are appropriate or inappropriate to disclose or change CPNI;
- (c) What to do if an employee receives a request for CPNI from law enforcement or any person other than the customer; and
- (d) What to do if an employee learns of or suspects a breach of a customer’s CPNI.

Further, VoIPStreet trains its personnel relative to the aforementioned and provides oversight and supervision relative to each employee’s compliance with the same. VoIPStreet has an express disciplinary process in place for the issue of CPNI, which may include up to termination.

### **Unauthorized Access/Release.**

VoIPStreet has established an acceleration procedure in the event it discovers an unauthorized access or release of CPNI, which includes notifying designated individuals within the company to address and assess such access or release and to take steps to prevent an identified unauthorized third party to gain further access. VoIPStreet has lawful procedures in place to notify law enforcement agencies, including the United States Secret Service and the Federal Bureau of Investigation, as well as policies and procedures to notify customers in the event of a data breach. VoIPStreet has established

an electronic ticket program that tracks and records any complaints it receives concerning the unauthorized use, disclosure, or access to CPNI.

### **Customer Access/Changes and Informative Notices.**

VoIPStreet has established procedures to identify, verify and authenticate customers that call the customer service center. Such procedures include a series of questions with answers which are known to the account holder. In general, VoIPStreet does not provide CPNI to individuals over the phone. In those rare instances that CPNI is provided over the phone, the caller must answer verification questions. If the verification questions can't be answered the individual will be denied access to CPNI.

Customers may access and change their own CPNI via the internet through a back office portal provided by VoIPStreet. The Back office is password protected and the data is protected through security measures including encryption. VoIPStreet has instituted procedures for authenticating customers online and for addressing lost or stolen passwords that are not based on readily available biographical information or account information. A Customer can only view CPNI relative to its own account and cannot view CPNI relative to any other customer. VoIPStreet has devised a method to notify customers via email if there is a change made with regard to specified information in its account.

### **Lawful Requests.**

VoIPStreet has designated a contact person to receive all lawful requests for CPNI from law enforcement agencies, regulatory bodies and the like. All such requests will be delivered to the designated individual and the documents relative to such request will be sent to the legal department for review and approval. The designated contact and legal counsel work together to comply with the request. Procedures for each request may vary depending on the type of request received.

### **Use for Marketing Purposes.**

At this time VoIPStreet does not use CPNI for marketing purposes. At this time VoIPStreet does not allow any third party or affiliates to use CPNI for marketing purposes. If VoIPStreet uses, or allows third parties to use, CPNI for marketing purposes the customers shall be offered the right to "Opt-Out" or "Opt-In" (depending on the situations).

### **Third Party Access.**

At present time, VoIPStreet permits access to CPNI to certain third parties for the purposes of performing provisioning, accounting, billing services, customer service, call center support, certain technical support services, and legal assistance. VoIPStreet also provides the employees of such third parties with the aforementioned manual and

requires the same to adhere to the rules, policies and procedures established by VoIPStreet.