

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011

Date filed: 01/04/2012

Name of company covered by this certification: Bingo Consulting LLC

Form 499 Filer ID: 826386

Name of signatory: Kunal Mittal

Title of signatory: President

I, Kunal Mittal, 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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed

Kunal Mittal [electronic signature]

## **CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) STATEMENT**

- Bingo Consulting LLC provides the Bingo Telecom ([www.bingotelecom.com](http://www.bingotelecom.com)) and DIDFORSALE ([www.didforsale.com](http://www.didforsale.com)) service. Bingo Telecom provides retail long distance service by allowing the customers to make calls from the US to other countries and DIDFORSALE resells the telephone service provided by other carriers in the US. Bingo Telecom started providing this service in 2007 and DIDFORSALE started providing service in September 2008.
- Bingo Consulting LLC does not make and has never made available to any affiliated or unaffiliated entity information that meets the definition of CPNI set forth in 47 U.S.C. § 222(h)(1), except in provision of telecommunications service from which such CPNI is derived, the billing for such telecommunications service, or when required to do so by law.
- Bingo Consulting LLC only uses the CPNI to render, and bill for, the telecommunication s services it provides to its customers.
- Bingo Consulting LLC does not engage in the practice of selling, lending, or licensing any CPNI to a third-party vendor for any purpose
- Bingo Consulting LLC authenticates a customer by a password prior to disclosing CPNI based on customer-initiated telephone contact, and online account access. If the customer does not provide a password, then it is Bingo Consulting LLC's policy to not disclose call detail information over the phone but by sending it to the customer's email address of record, or by calling the customer at the telephone number of record.
- Bingo Consulting LLC allows online access to CPNI related to a telecommunication service account through a password set by the user. In case the user forgets the

password then the password is never given to the user on the phone under any circumstance. The password is emailed to the email address on file while creating the account.

- All the information is sent to customers only on registered email address. If the customer request information from different email address, that request is denied.
- Customers are notified by email for all the change in service, and terms and condition.
- Third-party contractors sign Non-Disclosure Agreements and face civil penalties for improper use of the Company's proprietary information. Third party contractors do not get access to customer data on our servers.
- Customer login on secure website, all the transaction related to customers accounts are under secure website only. Customers call records are available only to customers once they are logged in on secured websites and call records are never disclosed over the phone.
- Very limited numbers of employees of Bingo Consulting LLC, have access to the CPNI. Employees must adhere to the following CPNI policy

All company records and information relating to the company, its employees, or its customers are confidential and employees must, therefore, treat all matters accordingly. There can be no removal of any company-related information, including without limitation, documents, notes, files, records, oral information, computer files, equipment, office supplies or similar materials from the employer's premises without permission from the company. Additionally, the contents of the employer's records or information otherwise obtained in regard to day to day business dealings may not be disclosed to anyone, except where required for a legitimate business purpose. Employees must not disclose any confidential information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside the Company. Employees who are unsure about the confidential nature of specific information have the burden to ask their supervisor for clarification. Employees will be subject to appropriate disciplinary action, up to and including dismissal, for knowingly

or unknowingly revealing information of a confidential nature.

In addition, when an employee leaves the company, the employee must return all Company related information and property that the employee has in his/her possession.

- Customer network and servers are behind a hardware firewall to prevent any possible intrusion from the outside. Besides the main firewall all the servers are secured by secondary software firewalls on each server.
- All the credit card information of our customers is stored in our database in encrypted format.
- Customer data is housed in secure databases that are constantly monitored and are not accessible from the internet.