

# CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

**Including:**

**Statement Explaining How Operating Procedures Ensure Regulatory Compliance**

**Explanation of Any Actions against Data Brokers, and**

**Summary of all Customer Complaints Received**

**Date filed:** March 1<sup>st</sup>, 2013

**Name of company covered by this certification:** Intermedia Voice Services, Inc.

**Form 499 Filer ID:** 829028

**Name of signatory:** Scott Allen

**Title of signatory:** Chief Financial Officer

Scott Allen signs this Certificate of Compliance in accordance with § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and 47 CFR 64.2009, on behalf of Intermedia Voice Services, Inc. (Company), related to the previous calendar year, 2012.

**Certification:**

I, Scott Allen, 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 (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

## **Annual Statement of FCC CPNI Rule Compliance**

This statement serves to explain how Intermedia Voice Services, Inc. (Company), is complying with Federal Communications Commission rules related to the privacy of customer information.

### **1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

### **2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

### **3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

### **4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

### **5. Customer Notification and Authorization Process**

The Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out process. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process. The Company has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

### **6. Record of Customer CPNI Approval/Non-Approval**

At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

### **7. Procedures Protecting Against Disclosure of CPNI**

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

- The Company has established procedures for authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.
- The Company provides customers with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).
- The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).
- The Company is in the process of implementing procedures to notify customers of account changes.

**8. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

**9. Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

**10. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.

**Explanation of Actions Against Data Brokers**

The Company has not encountered any circumstances requiring it to take any action against a data broker during the year to which this Certificate pertains.

**Summary of all Customer Complaints Received**

The following is a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI: None.

Date: March 1, 2013

Original signed by Scott Allen



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Scott Allen, CFO  
Intermedia Voice Services, Inc.