



February 5, 2014  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

**RE: Leap Frog Telecom, LLC d/b/a Voce Telecom  
CPNI Certification  
EB Docket No. 06-36; CY2013**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2013 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Leap Frog Telecom, LLC d/b/a Voce Telecom.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [stthomas@tminc.com](mailto:stthomas@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas

Consultant to Leap Frog Telecom, LLC d/b/a Voce Telecom

cc: Rosa Torraca - Leap Frog  
file: Leap Frog Telecom - FCC - Other  
tms: FCx1401

Enclosures  
ST/im



**Attachment A**  
**Statement of CPNI Procedures and Compliance**

## **Leap Frog Telecom, L.L.C. d/b/a Voce Telecom Statement of CPNI Procedures and Compliance**

Leap Frog Telecom, L.L.C. d/b/a Voce Telecom (“Voce” or “the Company”) does not use or permit access to CPNI to market any telecommunications or non-telecommunications services and trains its personnel that they are not to use CPNI for marketing purposes. Should Voce elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Voce does not disclose CPNI to any agents, affiliates, joint venture partners or independent contractors, nor does it use CPNI to identify or track customers who call competing providers. Voce does not provide CPNI to third parties, unless the request is made pursuant to a valid subpoena, court order, or other legally authorized request.

As set forth below, Voce has processes and procedures in place to safeguard its customers’ CPNI, including call detail information, from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. The Company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to ensure that procedures are being followed. The company has a progressive disciplinary process, which includes possible termination, in the event that an employee does not follow company procedures regarding CPNI.

The Company does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative. The customer service representative is trained to ONLY discuss over the phone the call detail information that the customer is able to provide. If the call detail cannot be provided by the customer, the Company will either call the customer back at the telephone number of record to provide the requested information or send the information to the customer’s address of record. If Voce elects in the future to provide telephone access to CPNI in response to a customer-initiated inquiry under any other circumstance, it will establish authentication and password procedures that comply with the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information.

For online account access, Voce has established authentication and password procedures that are in compliance with the applicable rules set forth in 47 CFR Subpart U.

Company has instituted procedures to notify customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account or address of record is created or changed without revealing the changed information or sending the notification to the new account information. Specifically, the Company notifies the customer via mail to the customer’s address of record (not the new address).

Voce does not have any retail locations and therefore does not disclose CPNI in-store.

The Company has procedures in place to notify law enforcement in the event of a breach of customers’ CPNI and to ensure that the affected customers are not notified of the breach before the time period set forth in the FCC’s rules, or, if applicable, when so authorized by law enforcement. Specifically, as soon as practicable, and in no case later than seven business days upon learning of a breach, the company will

notify the U.S. Secret Service and the FBI by electronic means, as required by FCC regulations. The company will not notify customers or disclose a breach to the public until seven full business days have passed after notification to the U.S. Secret Service and the FBI, unless it believes there is an extraordinarily urgent need to notify customers before seven days in order to avoid immediate and irreparable harm. In that instance, it will only notify such customers *after* consultation with the relevant investigating agency and will cooperate with the agency's request to minimize any adverse effects of the customer notification.. If the Company receives no response from law enforcement after the seventh full business day, it will promptly proceed to inform the customers whose CPNI was disclosed of the breach. The company will delay notification to customers or the public if requested to do so by the U.S. Secret Service or FBI. Notifications to law enforcement and customers are handled by a designated supervisor level employee responsible for managing the company's CPNI compliance.

The Company has not had any breaches of its customers' CPNI during the past year, but does have processes in place to ensure that it maintains electronic records of any breaches that are discovered and of notifications made to the USSS and the FBI, as well as to customers, for a period of at least two years. Information regarding any breaches and notifications will be maintained by a designated supervisor level employee responsible for managing the company's CPNI compliance.

Voce has not taken any actions against data brokers in the last year and did not receive any customer complaints about the unauthorized release or disclosure of CPNI in calendar year 2013.

Voce has not developed any information with respect to the processes pretexters are using to attempt to access CPNI, but does take steps to protect CPNI from pretexters as described in this Statement.