



February 21, 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: Equivoice Inc.  
CPNI Certification CY 2013  
EB Docket No. 06-36

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 Equivoice Inc.

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 Equivoice Inc.

cc: Richard Pierce, Equivoice  
file: Equivoice - FCC - Other  
tms: FCx1401

Enclosures  
ST/im

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification:                      Covering calendar year 2013  
Name of company(s) covered by this certification:      Equivoice, Inc.  
Form 499 Filer ID:    822086  
Name of signatory:    Richard Pierce  
Title of signatory:    Vice President

1. I, Richard Pierce, 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.*
2. 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 §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
Richard Pierce, Vice President

2-20-14  
Date

**Attachments:**      Accompanying Statement explaining CPNI procedures

## **Statement of CPNI Procedures**

Equivoice, Inc. ("Equivoice") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Equivoice 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. The Company has a strict policy prohibiting the disclosure of CPNI to any third parties, unless required to do so by law (e.g., in response to a subpoena).

Equivoice has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Equivoice has adopted and distributed to all employees a confidentiality policy that addresses proper handling and use of CPNI and advises all employees of their duty to safeguard CPNI. Employees are advised that violations of the policy will subject an employee to disciplinary action, up to and including immediate termination of employment. The Company makes CPNI available to employees only on a need-to-know basis.

Equivoice does not provide any telephone or in-store access to CPNI, including call detail. Customers requesting CPNI over the telephone will be provided with CPNI only by sending it to the customer's address of record or by calling the customer at the telephone number of record.

Equivoice has instituted authentication procedures to safeguard the disclosure of call detail online. Customers may access their CPNI online only after they have been authenticated without the use of readily available biographical information or account information. After initial authentication, customers may only access CPNI online by providing a password that is not prompted by a request for readily available biographical information or account information. Customers who have lost or forgotten their passwords may retrieve them by providing an answer to a shared secret question. If the customer cannot provide the correct password or correct response to the shared secret question, the customer must be re-authenticated and establish a new password.

Equivoice has put into place procedures to notify customers whenever a password, shared secret question for a lost or forgotten password or address of record is created or changed without revealing the changed information or sending the notification to the new account information. If a change is made, Equivoice notifies the customer immediately by email to the customer's email address of record or by a call to the customer's telephone number of record of any changes to the customer's password, shared secret question, online account information or address of record. This notice does not reveal the changed information and is sent to the existing (previous) address or telephone number of record only, and not to the changed address or number.

Equivoice's operating procedures require notification of relevant law enforcement agencies and customers in accordance with FCC rules in the event of a breach of CPNI. Equivoice maintains written records of any breaches discovered and notifications made to the USSS and the FBI, and to customers for two (2) years. These records include, where available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach and the circumstances of the breach.

Equivoice has not developed any information with respect to the processes they are using to attempt to access CPNI but does take steps to protect CPNI as described herein.