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February 25, 2014

Ms. Marlene H. Dortch, Commission Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Filed Electronically Via ECFS

RE: Vertex Telecom, Inc.
Customer Proprietary Network Information Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Vertex Telecom, Inc., by its undersigned attorneys, hereby submits its 2013 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or patrick@crockerlawfirm.com.

Very truly yours,

CROCKER & CROCKER

Patrick D. Crocker

PDC/tld

Enclosures

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013

Date filed: February 24, 2014

Name of Company Covered by this Certification: Vertex Telecom, Inc.

Form 499 Filer ID: 824966

Name of Signatory: Jim Chiu

Title of Signatory: President

I, Jim Chiu, 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.

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) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

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.

This Certification is dated this 24th day of February, 2014.

Jim Chiu
President
Vertex Telecom, Inc.

Customer Proprietary Network Information Certification
Accompanying Statement

VERTEX TELECOM, INC. ("VERTEX") has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI') set forth in sections 64.2001 — 64.2011 of the Commission's rules. This attachment summarizes VERTEX's practices and procedures, which have been updated to adequately ensure compliance with the Commission's CPNI rules.

Safeguarding against pretexting

- VERTEX takes reasonable measures to protect CPNI and believes that these measures sufficiently prevent unauthorized access to CPNI.

Training and discipline

- VERTEX has trained its personnel in the appropriate use of CPNI. All employees with access to CPNI are required to review and comply with VERTEX's CPNI policies and procedures.
- VERTEX has disciplinary process in place for violations of VERTEX's CPNI policies and procedures which would encompass any misuse of CPNI.

VERTEX'S use of CPNI

- VERTEX does not share, disclose, or otherwise provide CPNI to third parties.
- VERTEX may use CPNI for the following purposes:
  - To initiate, render, maintain, repair, bill and collect for services;
  - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent; and
  - To market additional services to customers that are within the same categories of service to which the customer already subscribes.
- VERTEX does not disclose or permit access to CPNI to track customers that call competing service providers.
- VERTEX discloses and permits access to CPNI where required by law (e.g., under a lawfully issued subpoena).

Customer approval and informed consent

- VERTEX does not use CPNI for any purpose that would require customer approval to do so. VERTEX does not use CPNI for any marketing purposes and does not share, disclose, or otherwise provide CPNI to any third party. If this policy changes in the future, VERTEX will implement practices and procedures to ensure compliance with the Commission's CPNI regulations.

Additional safeguards

- VERTEX has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- VERTEX designates one or more officers, as an agent or agents of the company, to sign and file a CPNI Compliance Certificate on an annual basis. The Certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- VERTEX properly authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact, online account access, or an in-person visit.
- VERTEX notifies customers immediately of any account changes.
- VERTEX may negotiate alternative authentication procedures for services that VERTEX provides to business customers that have both a dedicated account representative and a contract that specifically addresses VERTEX's protection of CPNI.
- In the event of a breach of CPNI, VERTEX will notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs VERTEX to delay notification, or VERTEX and the investigatory party agree to an earlier notification. VERTEX will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.