CROCKER & CROCKER
ATTORNEYS AT LAW

PATRICK D. CROCKER
patrick@crockerlawfirm.com

February 26, 2013

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

RE: Kajeet/Airlink, LLC
Customer Proprietary Network Information Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Kajeet/Airlink, LLC, 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 25, 2014

Name of company covered by this certification: Kajeet/Airlink, LLC

Form 499 Filer ID: 827750

Name of signatory: Ben Weintraub

Title of signatory: COO

I, Ben Weintraub, 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 25 day of February, 2014.

Ben J Weintraub

Ben Weintraub
COO
Kajeet/Airlink, LLC

CPNI Usage Policy Statement

1. Kajeet/Airlink, LLC ("Kajeet/Airlink") does not authorize the use, disclosure, or access to its customers' CPNI for any other purpose other than the provision or marketing of the company's services within the total service relationship between Kajeet/Airlink and its customers, which includes the provision of wireless local and long-distance telecommunications services, information services, and associated equipment.

2. Except as provided in Section 6, Kajeet/Airlink does not authorize the disclosure of its customers' CPNI to any unaffiliated third party for any purpose, including the cross-promotion of third-party products or services. All such disclosure is within the total services relationship.

3. Access to Kajeet/Airlink customer CPNI and personally identifiable information is restricted; access to such information is granted only to those employees and agents when necessary to provide or market Kajeet/Airlink's services and products exclusively as described in Section 1.

4. In compliance with 47 C.F.R. § 64.2009(b), Kajeet/Airlink employees and agents who may have access to CPNI and personally identifiable information undergo specific, detailed training including, but not limited to, CPNI protection procedures, reporting requirements, and the types of authentications required for disclosure of CPNI and personally identifiable information. All Kajeet/Airlink employees receive basic training on the Commission's rules regarding CPNI and Kajeet/Airlink's policies on the use and disclosure of CPNI and personally identifiable information. Kajeet/Airlink has disciplinary procedures in place should any employee or agent violate the company's policies with respect to the use and disclosure of CPNI and personally identifiable information.

5. Kajeet/Airlink does not currently share CPNI with any affiliated entities, as Kajeet/Airlink has no such affiliations.

6. Kajeet/Airlink requires that all vendors that may obtain CPNI or customer personally identifiable information must be contractually bound to: i) keep all information confidential; and ii) use such information only to provide contractually-required services to Kajeet/Airlink.

7. Kajeet/Airlink maintains a record of its sales and marketing campaigns that use Kajeet/Airlink customers' CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and the products and services offered as part of the campaign. These records are maintained for at least one year.

8. Kajeet/Airlink has in place a supervisory review process regarding compliance with the Commission's CPNI regulations for outbound marketing situations and maintains compliance records for at least one year. Kajeet/Airlink sales, marketing, and product personnel must obtain supervisory approval of any proposed outbound marketing request.

9. Kajeet/Airlink takes significant measures to discover and protect against attempts to gain unauthorized access to CPNI. Kajeet/Airlink has physical, electronic, and procedural safeguards to protect CPNI, including, but not limited to: Secure Socket Layer (SSL) encryption, firewalls and intrusion detection systems, and password protection of systems containing CPNI. Additionally, Kajeet/Airlink encourages its customers to protect passwords and take other measures that will prevent pretexting.

10. Kajeet/Airlink authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact or online account access.[1]

    a. When a request for access to CPNI is made via customer-initiated telephone contact, Kajeet/Airlink only discloses call detail information if the customer provides a password, as described in 47 C.F.R. § 64.2010(e), without any prompting by the carrier asking for readily available biographical information or account information. If the customer does not provide a password, Kajeet/Airlink will only disclose call detail information by sending it to the customer's address of record or by calling the customer at the telephone number of record.

    b. Kajeet/Airlink authenticates a customer without the use of readily available biographical information, or account information, prior to allowing the customer online access to CPNI related to a telecommunications service account. Once authenticated, the customer may only obtain online access to CPNI related to a Kajeet/Airlink service account by providing a password, as described in 47 C.F.R. § 64.2010(e), that is not prompted by the carrier asking for readily available biographical information, or account information.

11. Kajeet/Airlink establishes passwords for its customers by authenticating the customer without the use of readily available biographical information or account information. Kajeet/Airlink has established a back-up customer authentication method, which does not prompt the customer for readily available biographical information, in the event of a lost or forgotten password. If a Kajeet/Airlink customer cannot provide the correct password or the correct response for the back-up customer authentication method, Kajeet/Airlink requires that the customer establish a new password, in accordance with 47 C.F.R. § 64.2010(e).

12. Kajeet/Airlink has established 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. Such notifications are made through a Kajeet/Airlink-originated mail to the address of record.

13. In 2013, Kajeet/Airlink, to the best of its knowledge, did not experience a breach of its customers' CPNI. However, Kajeet/Airlink has procedures in place to timely notify federal authorities and its customers, and to maintain a record of such occurrences, as required under 47 C.F.R. § 64.2011 in the event of such a breach.

---

[1] Kajeet/Airlink does not allow any party access to CPNI through an in-store visit.