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

EB Docket 06-36

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

Date filed: February 28, 2014

Name of company(s) covered by this certification: Vaya Telecom, Inc.

Form 499 Filer ID: 827871

Name of signatory: Jim Beausoleil

Title of signatory: Chief Financial Officer

I, Jim Beausoleil, 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 set forth in section 64.2001 *et seq.* of the Commission s rules.

The company has not taken any actions (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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

The company represents and warrants that the above certification is consistent with 47 C.F.R. Section 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 U.S. Code and may subject it to enforcement action.

Signed _____

Attachment
Vaya Telecom, Inc.

Vaya Telecom, Inc. (the "Company") provides telecommunications and voice over internet (VoIP) services to its customers, which are primarily wholesale customers. The Company uses CPNI to initiate, provide and maintain service to customers, to bill and collect for such services, to protect against fraudulent, abusive or unlawful use of its services and as otherwise permitted or required by law.

The Company has implemented a system by which the status of each customer's CPNI approval can be established prior to the use of CPNI. The Company and its affiliates use CPNI to offer additional services to existing customers on a case-by-case basis, after proper notice and customer approval. The Company does not currently engage in any large-scale coordinated sales and marketing campaigns. The Company understands that if this were to change in the future, it would be required to maintain records including a description of each marketing campaign which used the CPNI, the specific CPNI that was used in the campaign and what products and services were offered as part of the campaign. The Company further understands that sales personnel must obtain supervisory approval of any outbound marketing campaign, which would require customer approval and has a review process in place regarding compliance with the rules for outbound marketing.

The Company protects CPNI from unauthorized and illegal use, access and disclosure. The Company does not share, sell, lease or otherwise provide CPNI to any of its suppliers, vendors or any other third parties for the purposes of marketing any services and has no plans to do so. Agreements with third parties that aid in the provision of customer services restrict the use and unauthorized disclosure of carrier and customer proprietary information. The Company also has implemented a system by which it may comply with the requirement that it provide notice to the Commission of any instance where the opt-out mechanisms do not work properly.

The Company additionally maintains a written policy which addresses the proper and improper uses of CPNI. The Company conducts a training program for its employees regarding the CPNI Policy and the safeguards required to protect against the unauthorized disclosure of CPNI. Employees that frequently work with CPNI (i.e., accounts receivable) are specifically instructed not to disclose CPNI to anyone other than the customer, with proper authentication. Failure to follow Company policy with regard to CPNI may result in escalating disciplinary action up to and including termination of employment.