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March 3, 2014

**VIA ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Suite TW-A325  
Washington D.C. 20554

Re: EB Docket 06-36

Dear Ms. Dortch:

On behalf of IBDC Telecom Corporation (“Company”), enclosed herewith is Company’s 2013 CPNI certification. Should you have any questions concerning this submission, please do not hesitate to contact the undersigned.

Sincerely,

/s/ John Beahn

John Beahn  
Joshua Gruenspecht  
Counsel to IBDC Telecom Corporation

cc: James Mola, IBDC Telecom Corporation

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

1. Date filed: March 3, 2014
2. Name of company(s) covered by this certification: IBDC Telecom Corporation
3. Name of signatory: James Mola
4. Title of signatory: President
5. Certification:

I, James Mola, 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.

Signed  \_\_\_\_\_

James Mola  
President

Attachments:           Accompanying Statement explaining CPNI procedures

## ATTACHMENT A: STATEMENT OF CPNI COMPLIANCE PROCEDURES

IBDC Telecom Corporation (“Company”) has established and implemented internal operating procedures which are designed to ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended (“Act”), (Privacy of Customer Information) and with the Federal Communications Commission’s (“FCC” or “Commission”) rules governing Customer Proprietary Network Information (“CPNI”) which are codified at 47 C.F.R. Part 64, Subpart U (“Rules”).

Primary responsibility for Company’s CPNI practices and policies resides with the company’s CEO in consultation with its President and outside counsel. Those corporate officers have reviewed Section 222 of the Act and the FCC’s CPNI rules and are thoroughly familiar with their requirements.

Company recognizes that it may use, disclose or permit access to CPNI to provide or market service offerings among the categories of service to which a customer has already subscribed, and for the purposes outlined in 47 U.S.C. § 222(d). Company also recognizes that when it provides more than one category of service to a customer it may share the customer’s CPNI with the affiliate, if any, that provides the service to the customer, and that it may not provide CPNI to affiliates that do not provide service to the customer without the customer’s prior approval.

Company does not make available to any unaffiliated entity, or to any affiliated entity that does not already provide service to a customer, information which meets the definition of CPNI codified at 47 U.S.C. § 222(h)(1), except when required to do so by law (*e.g.*, when subject to a properly-issued subpoena by law enforcement departments), or as permitted under 47 U.S.C. § 222(d).

Company will disclose to a customer that customer’s own CPNI information. It will also disclose that CPNI information to a person specifically designated by the customer such as, for example, an attorney who represents the customer in a matter where the CPNI information is necessary to the attorney’s effective representation of the customer, but only upon receiving a direct request in writing from the customer. Requests for CPNI are routinely routed to outside counsel for review in the event that there appears to be any question as to whether the request should be approved.

Company undertakes periodic reviews of its practices to ensure that it remains in compliance with CPNI rules. All Company personnel having access to CPNI have been instructed in Company’s policies governing CPNI. Company requires each of its employees to sign confidentiality agreements and adhere to company policies protecting all confidential information, including confidential subscriber information, and trains its customer service representatives to conform to confidentiality practices. Company also requires all third party vendors (such as billing and collection agencies and other parties obtaining CPNI or any of its components under 47 U.S.C. § 222(d)) to execute agreements and comply with Company’s policies protecting the confidentiality of all information, including all customer information, which may come into their possession pursuant to 47 U.S.C. § 222(d).

As Company does not use CPNI for any purpose requiring customer approval and does

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not provide CPNI to unrelated entities (except when compelled to do so or as requested to do so by customers), it has not implemented either “opt-in” or “opt-out” approval procedures as those terms are defined at Section 64.2005 of the Commission’s Rules. In the event that Company, in the future, would utilize CPNI or provide CPNI to other entities other than as described above, it will first provide customer notifications of their CPNI rights as required by the Commission’s Rules.

Company makes the following certifications, pursuant to 47 C.F.R. §§64.2001, *et seq.*:

1. The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify any information that meets the definition of CPNI under Section 64.2003(g) of the Commission’s Rules and Section 222(f)(1) of the Act.
2. The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that impact the Company’s use of CPNI.
3. The Company has established procedures and trained employees having access to, or occasion to use CPNI, and to identify uses of CPNI that do not require customer authorization under Section 64.2005 of the Rules.
4. The Company has established procedures and trained employees having access to, or occasion to use CPNI, and to identify uses of CPNI that specifically require advance customer authorization under Section 64.2007 of the Rules.
5. The Company does not provide CPNI to other parties, and does not use CPNI for marketing. If the Company decides to use CPNI for marketing in the future, it will train its employees in advance on their responsibilities for obtaining customer authorization to use CPNI for marketing purposes and the notice and approval requirements under Section 64.2008.
6. The Company requires authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits. The Company does not permit on-line access to customer account information. The Company has procedures in place to notify customers of account changes.
7. The Company has taken no actions against data brokers, and has received no customer complaints concerning the unauthorized release of CPNI.
8. The Company has in place disciplinary procedures to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b) of the Rules.
9. The Company has adopted procedures to comply with Section 64.2011 of the Rules for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.

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Company does not believe that it provides services that subject it to the applicability of the Commission's CPNI Rules, but has adopted and enforces the procedures herein in the event it is deemed to be subject to the Rules. The Company has not begun operations that require compliance with the Rules, but files this statement out of an abundance of caution and to cover any operations that may be initiated this year.

These procedures and policies have been specifically approved by Company's corporate officers.