

Computer Telephony Innovations Inc dba Voxtelesys.com  
1801 23<sup>rd</sup> Ave N  
Fargo, ND 58102

Date: March 26, 2020

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 11th Street, SW  
Washington, DC 20554

R E : C e r t i f i c a t i o n o f C o m p l i a n c e w i t h R u l e 6 4 . 1 8 0 1

Dear Ms. Dortch:

Computer Telephony Innovations Inc dba Voxtelesys.com, (FRN: 0018456251) with the geographic rate averaging and rate integration requirements of Commission Rule 64.1801 (47 C.F.R. § 64.1801).

I hereby verify that I am an officer of and authorized to make this certification on its behalf, and that the foregoing certification is true, complete, and correct to the best of my knowledge. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signature: Bruce Burke

Printed Name: Bruce Burke

Title: Secretary / Treasurer

Federal Communications Commission  
Page Two

I, Bruce Burke (Secretary & Treasurer) of Computer Telephony Innovations Inc dba Voxtelosys.com 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 as Exhibit "A" is an accompanying statement explaining how Computer Telephony Innovations Inc dba Voxtelosys.com procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 et seq. of the Commission's rules.

Signature: Bruce Burke

Printed Name: Bruce Burke

Title: Secretary / Treasurer

Computer Telephony Innovations, Inc

**STATEMENT EXPLAINING HOW THE COMPANY'S OPERATING PROCEDURES  
ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES**

February 13, 2019

**Prefatory Statement:**

Computer Telephony Innovations, Inc. has elected not to utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval in accordance with Section 64.2005 of the FCC's Rules and Regulations.

**I. Customer Proprietary Network Information ("CPNI")**

The law affords privacy protections for two kinds of information related to Computer Telephony Innovations, Inc. as a telecommunications carrier: (1) information about the quantity, technical configuration, type, destination, location, and amount of a telecommunications service subscribed to by any customer, and (2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer.

That information, when matched to a name, address, and telephone number is known as "Customer Proprietary Network Information or "CPNI" for short. Examples of CPNI include information typically available from telephone-related details on a monthly bill such as the types of services purchased by a customer, numbers called, duration of calls, directory assistance charges, and calling patterns. (CPNI does not include names, addresses, and telephone numbers, because that information is considered subscriber list information under applicable law.

**II. Use of CPNI Is Restricted**

Computer Telephony Innovations, Inc. recognizes that CPNI privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside our company.

Computer Telephony Innovations, Inc. has designated its President as the CPNI Compliance Officer responsible for: (1) communicating with our company attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of company employees and agents who use or have access to CPNI; and

(3) receiving, reviewing and resolving any questions or issues arising within our company regarding use, disclosure, or provision of access to CPNI.

Company employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the company's CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

### **III. Permissible Uses of CPNI**

Computer Telephony Innovations, Inc. employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside the company, except as follows:

1. Computer Telephony Innovations, Inc. may, after receiving an appropriate request from a customer, disclose or provide the customer's CPNI to any person or entity designated by the customer. Any and all such customer requests: (1) must be made in writing; (2) must include the customer's correct billing name and address and telephone number; (3) must specify exactly what type or types of CPNI must be disclosed or provided; (4) must specify the time period for which the CPNI must be disclosed or provided; and (5) must be signed by the customer.
2. In the absence of an appropriate written request from the customer, Computer Telephony Innovations, Inc. may still provide the customer's phone records or other CPNI to a law enforcement agency in response to a warrant or subpoena that specifies the particular CPNI to be furnished.
3. Computer Telephony Innovations, Inc. may use, disclose or permit access to CPNI to provide the same category of telecommunications service to a customer from which the CPNI is derived. For example, we may use the CPNI from our provision of long distance service to a customer to provide or market new, additional or modified long distance service offerings to the customer.
4. Computer Telephony Innovations, Inc. and its authorized employees may use, disclose or permit access to CPNI to provide services necessary to, or used in, the provision of the telecommunications service from which the CPNI is derived.
5. Computer Telephony Innovations, Inc., its authorized employees and its billing agent may use CPNI to initiate, render, bill and collect for telecommunications services.
6. Computer Telephony Innovations, Inc. may use CPNI to protect company rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived.
7. If a customer subscribes to more than one category of service offered by Computer Telephony Innovations, Inc., we are permitted to share CPNI among its affiliated entities that provide a service offering to the customer.

8. When an existing customer calls Computer Telephony Innovations, Inc. to inquire about or order new, additional or modified services (in-bound marketing), we may use the customer's CPNI to assist the customer for the duration of the customer's call if we provide the customer with the oral notice required by Sections 64.2008(c) and 64.2008(f) of the FCC's Rules.

9. Computer Telephony Innovations, Inc. has adopted a policy that it does not and will not use, disclose, or permit access to CPNI in connection with company-initiated marketing of services to which a customer does not already subscribe. (out-bound marketing).

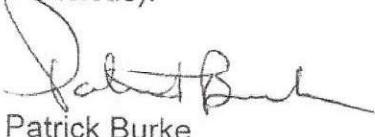
#### IV. CPNI Compliance Officer

In addition to the specific matters required to be reviewed and approved by Computer Telephony Innovations, Inc.'s CPNI Compliance Officer, employees and agents are strongly encouraged to bring any and all other questions, issues or uncertainties regarding the use, disclosure, or access to CPNI to the attention of the our Compliance Officer for appropriate investigation, review and guidance. The extent to which a particular employee or agent brought a CPNI matter to the attention of the CPNI Compliance Officer and received appropriate guidance is a material consideration in any disciplinary action brought against the employee or agent for impermissible use, disclosure or access to CPNI.

#### V. Disciplinary Procedures

Computer Telephony Innovations, Inc. has informed its employees and agents that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important.

Violation by company employees or agents of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, probation, and termination), depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from the CPNI Compliance Officer, and the extent to which the violation was or was not deliberate or malicious).

  
Patrick Burke

President, Computer Telephony Innovations, Inc.

FCC Annual Filing

Federal Communication Commission  
Page Three

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

**EB Docket (#)**

Computer Telephony Innovations Inc dba Voxtelesys.com 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) 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.

Computer Telephony Innovations Inc dba Voxtelesys.com 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). *Exhibit B*

Signature: Bruce Burke

Printed Name: Bruce Burke

Title: Secretary / Treasurer

Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket 06-36

Annual 64.2009(c) CPNI Certification for 2019

Date filed: February 13, 2019

Name of company(s) covered by this certification: Computer Telephony Innovations, Inc.

Form 499 Filer ID: 827574

Name of signatory: Patrick Burke

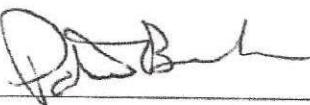
Title of signatory: President

I, Patrick Burke, 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 [attach accompanying statement].

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) 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. If affirmative: No action.

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). If affirmative: No complaints.

Signed  [signature]

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

**EB Docket 06-36**

Exhibit *A* *B*

Computer Telephony Innovations Inc dba Voxtelesys.com

Compliance Requirements

Computer Telephony Innovations Inc dba Voxtelesys.com  
1801 23<sup>rd</sup> Ave N  
Fargo, ND 58102

### Compliance Requirements

Computer Telephony Innovations Inc dba Voxtelesys.com maintains the following operating procedures to ensure compliance with the requirements set forth in Section 64.2001 et seq. of the Commission's rules.

#### **Section 64.2005 Use of customer proprietary network information without customer approval.**

(a) Any telecommunications carrier may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service (i.e., local, Interexchange, and CMRS) to which the customer already subscribes from the same carrier, without customer approval.

(1) If a telecommunications carrier provides different categories of service, and a customer subscribes to more than one category of service offered by the carrier, the carrier is permitted to share CPNI among the carrier's affiliated entities that provide a service offering to the customer.

(2) If a telecommunications carrier provides different categories of service, but a customer does not subscribe to more than one offering by the carrier, the carrier is not permitted to share CPNI with its affiliates, except as provided in § 64.2007(b).

(b) A telecommunications carrier may not use, disclose, or permit access to CPNI to market to a customer service offerings that are within a category of service to which the subscriber does not already subscribe from that carrier, unless that carrier has customer approval to do so, except as described in paragraph(c ) of this section.

(1) A wireless provider may use, disclose or permit access to CPNI derived from its provision of CMRS, without customer approval, for the provision of CPE and information service(s). A wire line carrier may use, disclose or permit access to CPNI derived from its provision of local exchange service or interexchange service, without customer

approval, for the provision of CPB and call answering, voice mailer messaging, voice storage and retrieval services, fax store and forward protocol conversion.

(2)A telecommunications carrier may not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers. For example, a local exchange carrier may not use local service CPNI to track all customers that call local service competitors.

(c )A telecommunications carrier may use, disclose, or permit access to CPNI, without customer approval, as described in this paragraph (c ).

(1)A telecommunications carrier may use, disclose, or permit access to CPNI, without customer approval, in its provision of inside wiring installation, maintenance, and repair services.

(2)CMRS providers may use, disclose, or permit access to CCPNI for the purpose of conducting research on the health effects of CMRS.

(3)LECs, CMRS providers, and interconnected VoIP providers may use CPNI, without customer approval, to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

(d)A telecommunications carrier may use, disclose, or permit access to CPNI to protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

*The Company has adopted specific CPNI policies to ensure that, in the absence of customer approval, CPNI is only used by the Company to provide or market service offerings among the categories of service (i.e., local interexchange, and CMRS) to which the customer already subscribes. The Company's CPNI policies prohibit the sharing of CPNI with affiliated companies, except as permitted under Rule 64.2005(a)(1) or with customer approval pursuant to Rule 64.2007(b). The only exceptions to these policies are as permitted under 47 U.S.C § 222(d) and Rule 64.2005.*

#### **Section 64.2007 Approval required for use of customer proprietary network information.**

(a)A telecommunications carrier may obtain approval through written, oral or electronic methods.

(1) A telecommunications carrier relying on oral approval shall bear the burden of demonstrating that such approval has been given in compliance with the Commission's rules in this part.

(2) Approval or disapproval to use, disclose, or permit access to a customer's CPNI obtained by a telecommunications carrier must remain in effect until the customer revokes or limits such approval or disapproval.

(3) A telecommunications carrier must maintain records of approval, whether oral, written, or electronic, for at least one year.

In all circumstances where customer approval is required to use, disclose or permit access to CPNI, the Company's CPNI policies require that the Company obtain customer approval through written, oral or electronic methods in compliance with Rule 64.2007. A customer's approval or disapproval remains in effect until the customer revokes or limits the approval or disapproval. The Company maintains records of customer approval (whether written, oral or electronic) for a minimum of one year.

(b) *Use of Opt-Out and Opt-In Approval Processes.* A telecommunications carrier may, subject to opt-out approval or opt-in approval, disclose its customer's individually identifiable CPNI for the purpose of marketing communications-related services to that customer. A telecommunications carrier may, subject to opt-out approval or opt-in approval, disclose its customer's individually identifiable CPNI, for the purpose of marketing communications-related services to that customer, to its agents and its affiliates that provide communications-related services. A telecommunications carrier may also permit such person or entities to obtain access to such CPNI for such purposes. Except for use and disclosure of CPNI that is permitted without customer approval under section § 64.2005, or that is described in this paragraph, or as otherwise provided in section 222 of the Communications Act of 1934, as amended, a telecommunications carrier may only use, disclose, or permit access to its customer's individually identifiable CPNI subject to opt-in approval.

The Company does not use CPNI for any purpose (including marketing communications-related services) and does not disclose or grant access to CPNI to any party (including to agents or affiliates that provide communications-related services), except as permitted under 47 U.S.C. § 222(d) and Rule 64.2005.

**Section 64.2008 Notice required for use of customer proprietary network information.**

(a) *Notification, Generally.*

(1) Prior to any solicitation for customer approval, a telecommunications carrier must provide notification to the customer of the customer's right to restrict use of, disclose of, and access to that customer's CPNI.(2) A telecommunications carrier must

maintain records of notification, whether oral, written, or electronic, for at least one year.

(b) Individual notice to customers must be provided when soliciting approval to use, disclose, or permit access to customers' CPNI.

(c) *Content of Notice.* Customer notification must provide sufficient information to enable the customer to make an informed decision as to whether to permit a carrier to use, disclose, or permit access to, the customer's CPNI.

(1) The notification must state that the customer has a right, and the carrier has a duty, under federal law, to protect the confidentiality of CPNI.

(2) The notification must specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.

(3) The notification must advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, carriers may provide a brief statement, in a clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.

(4) The notification must be comprehensible and must not be misleading.

(5) If written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.

(6) If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.

(7) A carrier may state in the notification that the customer's approval to use CPNI may enhance the carrier's ability to offer products and services tailored to the customer's needs. A carrier also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

(8) A carrier may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

(9) The notification must state that any approval, or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from that carrier is valid until the customer affirmatively revokes or limits such approval or denial.

(10) A telecommunications carrier's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

The Company's CPNI policies require that customers be notified of their rights, and the Company's obligations, with respect to CPNI prior to any solicitation for customer approval. All required customer notices (whether written, oral or electronic) comply with the requirements of Rule 64.2008. The Company maintains records of all required customer notices (whether written, oral or electronic) for a minimum of one year.

(d) *Notice Requirements Specific to Opt-Out.* A telecommunications carrier must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except as provided in paragraph (f) of this section). The contents of any such notification must comply with the requirements of paragraph (c) of this section.

(1) Carriers must wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. A carrier may, in its discretion, provide for a longer period. Carriers must notify customers as to the applicable waiting period for a response before approval is assumed.

(i) In the case of an electronic form of notification, the waiting period shall begin to run from the date on which the notification was sent; and

(ii) In the case of notification by mail, the waiting period shall begin to run on the third day following the date that the notification was mailed.

(2) Carriers using the opt-out mechanism must provide notices to their customers every two years.

(3) Telecommunications carriers that use e-mail to provide opt-out notices must comply with the following requirements in addition to the requirements generally applicable to notification:

(i) Carriers must obtain express, verifiable, prior approval from consumers to send notices via e-mail regarding their service in general, or CPNI in particular;

(ii) Carriers must allow customers to reply directly to e-mails containing CPNI notices in order to opt-out;

(iii) Opt-out e-mail notices that are returned to the carrier as undeliverable must be sent to the customer in another form before carriers may consider the customer to have received notice;

(iv) Carriers that use e-mail to send CPNI notices must ensure that the subject line of the message clearly and accurately identifies the subject matter of the e-mail; and

(v) Telecommunications carriers must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. Carriers may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

The Company does not currently solicit "opt out" customer approval for the use or disclosure of CPNI. The Company does not use CPNI for any purposes (including marketing communications-related services) and does not disclose or grant access to CPNI to any party (including to agents or affiliates that provide communications-related services), except as permitted under 47 U.S.C § 222(d) and Rule 64.2005

*(e) Notice Requirements Specific to Opt-In.*

A telecommunications carrier may provide notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the requirements of paragraph (c) of this section.

The Company does not currently solicit 'opt-in' customer approval for the use or disclosure of CPNI. The Company does not use, disclose or grant access to CPNI for any purpose, to any party or in any manner that would require a customer's "opt in" approval under the Commission's CPNI Rules.