

February 13, 2019

**Via FCC ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

RE: GetGo Communications LLC  
Form 499 Filer ID: 829933  
Annual Customer Proprietary Network Information Compliance Certification  
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of GetGo Communications LLC, please find the Annual Customer Proprietary Network Information (“CPNI”) Compliance Certification, EB Docket No. 06-36, for calendar year 2018.

Questions regarding this filing may be directed to Kristin Sourbeer at 202-730-1323 or [ksourbeer@hwglaw.com](mailto:ksourbeer@hwglaw.com).

Sincerely,



Kristin Sourbeer  
*Counsel to GetGo Communications*

enc.

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for **2019**, covering the prior calendar year **2018**

1. Date filed: **February 13, 2019**
2. Name of company covered by this certification: **GetGo Communications, LLC**  
(formerly Citrix Communications, LLC)
3. Form 499 Filer ID: **829933**
4. Name of signatory: **Michael Donahue**
5. Title of signatory: **Secretary**

I, **Michael Donahue**, 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, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company **has not** taken any actions (*i.e.*, proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company **has not** received any 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 

**Attachments:** Accompanying Statement explaining CPNI procedures

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

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**General duty, training, and discipline.**

GetGo Communications LLC (the “Company”) has adopted and distributed to all employees a confidentiality policy that addresses proper handling and use of CPNI and advises all employees of their duty to safeguard CPNI. Employees are advised that violations of the confidentiality policy will subject an employee to disciplinary action, up to and including immediate termination of employment. The Company makes CPNI available to employees only on a need-to-know basis.

**Use of customer proprietary network information without customer approval (47 C.F.R. § 64.2005); Approval required for use of customer proprietary network information (47 C.F.R. § 64.2007); Notice required for use of customer proprietary network information (47 C.F.R. § 64.2008); Safeguards required for use of customer proprietary network information (47 C.F.R. § 64.2009)**

The Company does not use, disclose, or permit access to CPNI for marketing purposes. The Company does not disclose CPNI to third parties or permit third parties to access or use CPNI.

**Safeguards on the disclosure of customer proprietary network information (47 C.F.R. § 64.2010)**

Account information may only be accessed with the customer’s password, without exception. No account information is to be given to a customer, or account information changed, unless the customer provides the GetGo Communications password. No email may be sent to any email address other than the customer’s email address of record under any circumstances. After accessing a customer’s account information, a customer service agent should remind the customer how to change their password.

New customers will receive an automatically-generated email notification, sent to their registered e-mail address, containing an administrator GetGo Communications system password. Emails will be sent exclusively to the email address of record entered by the customer at the time the account is established.

In the event that a customer misplaces their password, the customer may contact customer service for password reset assistance. If the customer contacts customer service to request a password, the customer service representative will access the “Reset Password” feature which will generate an email containing the customer’s password to the customer’s email address of record.

## **Attachment 1: GetGo Communications LLC, Statement Concerning Company Procedures**

GetGo Communications customers can access and review their account by calling customer service at 1-855-673-2532. Changes to personal customer account information are made by customer service representatives at the specific request of a customer.

In the event that a customer requests a change to their account by contacting a customer service representative, the following process will be followed by the customer service representative:

- 1) Confirm the customer's password of record and conduct an extensive account verification check, including e-mail address, name, phone, and account usage;
- 2) Confirm the caller's first and last name and the account name by requesting the information from the customer;
- 3) Make the requested change in the Internal Admin system database;
- 4) Document the caller's name, requested change, and date and time of the change request in the customer service account database; and
- 5) Immediately send a confirmation email to the customer's email address of record confirming the changes made, using the following email template:

*Dear <insert customer name here>:*

*Our records indicate that on [Date] you, or someone providing your GetGo Communications password, requested that the following changes to your account information be made: [list type of change but do not provide specific data, i.e. "change in billing location"].*

*If you did not request these changes, or if you did not authorize that these changes be made, please contact GetGo Communications customer service immediately at 1-855-673-2532 or [getgocommunications@logmein.com](mailto:getgocommunications@logmein.com).*

*Thank you for your business.*

*GetGo Communications LLC*

In the event that the customer receives notification of the change but did not authorize an account change request, the customer service agent should immediately:

- 1) Access the change request call documentation;
- 2) Inform the customer of who made the request;
- 3) Verify whether the customer did make the change,
- 4) Inform your supervisor of the situation;
- 5) Immediately change the customer's account password after verifying the customer's email address and current account information;

## **Attachment 1: GetGo Communications LLC, Statement Concerning Company Procedures**

- 6) Send an email to the customer's registered email address with the new password;  
and
- 7) Document the situation in the customer service account database.

### **Notification of customer proprietary information security breaches (47 C.F.R. § 64.2011)**

Any suspected compromise of CPNI or other customer data must be promptly reported to management. Management will carry out breach notification of relevant law enforcement agencies and customers in accordance with the FCC rules. All breaches will be documented according to the FCC CPNI rules and the GetGo Incident Response Policy. These records must include dates of discovery and notification, a detailed description of the CPNI data subject to the breach, and the circumstances of the breach. GetGo Communications will maintain these records for a minimum of 2 years.

### **Reference**

Customer Propriety Network Information (CPNI) Compliance:

<http://www.fcc.gov/eb/CPNI/>

### **Revision Tracking**

This policy will be reviewed on an annual basis by the Director of Regulatory Compliance or Counsel.

<b>Name</b>	<b>Action</b>	<b>Date Revised</b>
Brita Strandberg	Draft and confirm; final	2/2014
Peter McElligott	2015 review and update	2/18/2015
Peter McElligott	2016 Review and Confirm	2/11/2016 (no revision)
Kristin Sourbeer	2018 Review and update company name / contact information	2/20/2018