



Tax Rating Services
Telecom & Sales Tax Services
Corporate Income Tax Services
FCC & State Regulatory Services

407-260-1011

407-260-1033 fax

mark@csilongwood.com

242 Rangeline Road, Longwood, FL 32750

February 21, 2019
Via US ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: Telefonica USA, Inc
Form 499 Filer ID: 824684
Annual Customer Proprietary Network Information Compliance Certification;
EB Docket No. 06-36

Dear Ms. Dortch,

Enclosed for filing is the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification; EB Docket No. 06-36, filed on behalf of Telefonica USA, Inc.

Please do not hesitate to contact me at 407-260-1011 or mark@csilongwood.com if you have any questions or concerns.

Thank you for your assistance in processing this filing.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark G. Lammert", is written over a horizontal line.

Mark G. Lammert, CPA
Tax Preparer for Telefonica USA, Inc

cc: Telefonica USA, Inc
file: Telefonica USA, Inc – PUC - FCC

ANNUAL 47 C.F.R. S: 64.2010 (e) CPNI CERTIFICATION FOR 2019

EB Docket 06-36

Date Filed: 2/20/2019

Name of Company: Telefonica USA, Inc.

Form 499 Filer ID: 824684

Name of Signatory: Joanna Romano

Title of Signatory: Legal Director

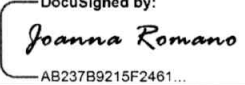
I, Joanna Romano, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

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 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  Joanna Romano, Legal Director
AB237B9215F2461...

Attachments: Accompanying Statement explaining CPNI procedures

ATTACHMENT A

Statement of CPNI Procedures and Compliance

Telefonica USA, Inc. (the "Company") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services and trains its personnel that they are not to use CPNI for marketing purposes.

Company does not disclose CPNI to any agents, affiliates, joint venture partners or independent contractors nor does it use CPNI to identify or track customers who call competing providers. Company does not provide CPNI to third parties unless the request is made pursuant to a valid subpoena, court order or other legally authorized request.

Company has the processes and procedures set forth below in place to safeguard customer CPNI from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain access to customer CPNI on an ongoing basis. Company secures its network, using password systems, using notification systems, and monitoring for unauthorized access.

Company monitors the interactions of its employees with customers to ensure that procedures are being followed. The Company has a progressive disciplinary process which includes possible termination in the event that an employee does not follow company procedures regarding CPNI.

Company's practice is not to disclose CPNI over the telephone in response to customer inquiries without prior authentication using account-based methods, and unless the customer can independently provide the call detail information that is the subject of the inquiry.

For online account access, Company has established authentication and password procedures that are in compliance with the applicable rules set forth in Part 64, Subpart U of the Commission's rules.

Company's practice is to notify customers whenever a password, online account or address of records is created or changed on an existing account. Notifications are triggered automatically at the database level when the change is made. The notifications are sent to the email of record prior to the change.

The Company has procedures in place to notify law enforcement in the event of a breach of customer's CPNI and to ensure that the affected customers are not notified in accordance with the Commission's rules. It is Company's practice to maintain its records of any breaches for at least 2 years.