



February 22, 2019

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: Grande Communications Networks, LLC (ID 820409)

Annual CPNI Compliance Certification, EB Docket No. 06-36

Dear Secretary Dortch:

Attached for filing in EB Docket No. 06-36, please find the Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certificate and accompanying statement of Grande Communications Networks, LLC.

If there are questions regarding this filing please contact the undersigned. Thank you for your assistance.

Sincerely,

Grande Communications Networks, LLC

Jeffrey B. Kramp

Senior Vice President, General Counsel & Corporate Secretary

401 Carlson Circle
San Marcos, TX 78666

Annual 17 C.F.R. § 64.2009(e) CPNI Certification EB
Docket 06-36

Annual 64.2009(e) CPNI Certification covering the prior calendar year: **2018**

Date filed: **February 22, 2019**

Name of company covered by this certification: **Grande Communications Networks, LLC**

Form 499 Filer ID: **820409**

Name of signatory: Jeffrey B. Kramp

Title of signatory: Senior Vice President, General Counsel & Corporate Secretary

I, Jeffrey B. Kramp , 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 any 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 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: _____



Attachment: Accompanying Statement explaining CPNI procedures

ACCOMPANYING STATEMENT
ANNUAL 47C.F.R § 64.2009(e) CPNI CERTIFICATION

The policy of Grande Communications Networks, LLC ("Grande") is to comply with the letter and spirit of all laws of the United States, including those pertaining to CPNI contained in § 222 of the Telecommunications Act of 1996, as amended, 47 USC § 222 and the FCC's regulations, 47 CFR § 64.2001- .2011. Grande will revise its procedures as needed to reflect any subsequent revisions to the applicable law and regulations addressing CPNI.

1. Use of CPNI

The Company has adopted specific CPNI policies to ensure that, in the absence of customer approval, it may only use, disclose, or permit access to individually identifiable CPNI in its provision of: (1) the telecommunications service from which the information is derived; (2) services necessary to, or used in, the provision of the telecommunications service, including the publishing of directories; or (3) as otherwise permitted by law and regulation.

Grande does not use, disclose, or permit access to CPNI to market service offerings to a customer that are not within a category of service to which the customer already subscribes, unless Grande has customer approval to do so.

Grande does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.

2. Obtaining Customer Approval for Use of CPNI

Grande has established methods to obtain customer approval for use of CPNI through written or electronic methods, including:

Grande must be able to record the customer's approval or disapproval or permit access to CPNI which must remain in effect until the customer revokes or limits such approval or disapproval.

Grande must establish methods to allow a customer to limit or revoke their approval or disapproval.

Grande must maintain records of approval for at least one year.

Opt- Out Approval Processes

- a. Grande may utilize the opt-out method to obtain approval to use CPNI for the purpose of marketing communications- related services to that customer.
- b. Grande may utilize the opt-out method to obtain approval to disclose CPNI, for the purpose of marketing Grande communications- related services to that

customer, to its agents or to its affiliates that provide communications- related services.

Opt-In Requirements

Grande shall prohibit use of CPNI for any purpose that requires opt-in approval.

3. Notice Required for Use of CPNI

Prior to soliciting any customer approval to use, disclose, or permit access to customers' CPNI, Grande notifies the customer of the customer's right to restrict use of, disclosure of, and access to, the customer's CPNI. Grande provides such notice to new customers at the time of subscription. Grande has re-notified all existing customers they may opt- out of use of CPNI and will do so again at least every two years. Grande will maintain records of the notification, whether oral, written or electronic, for at least one year. The content of customer notification meets the requirements of Section 64.2008 (c) and (d) of the Commission's CPNI Rules. Grande provides notification to obtain opt-out approval through written methods and waits at least 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. The notice discloses the applicable waiting period for a response before approval is assumed. The Opt-Out method is available to every customer at no additional cost to the customer and available 24 hours a day, seven days a week.

Grande does not use methods that require opt-in approval; therefore has not established procedures for opt-in notice and approval.

In instances where the Company seeks one-time customer approval for the use or disclosure of CPNI, the Company obtains such approval in accordance with the disclosures, methods and requirements contained in Section 2008(f) of the Commission's rules.

4. Company Safeguards for Use of CPNI

Grande has established a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

Grande has trained all its personnel as to when they are and are not authorized to use CPNI, and has adopted and communicated an express disciplinary process. Any improper use shall be treated as a serious offense, and may result in suspension or termination of employment in appropriate cases. Any company personnel making improper use of CPNI will undergo additional training to ensure future compliance. Grande will provide additional training on an as-needed basis.

Grande maintains a record, electronically or in some other manner, of its and its affiliates' sales and marketing campaigns that use customers' CPNI. Grande shall maintain a record of all instances where CPNI was disclosed or provided to third

parties, or where third parties were allowed access to CPNI. The record shall include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Grande shall retain the record for a minimum of one year.

Grande has established a supervisory review process regarding compliance with the Commission's rules for outbound marketing situations using CPNI and maintains records of Grande compliance for a minimum period of one year. Sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

A Grande officer (the "CPNI Officer"), as an agent of the carrier, shall sign and file with the FCC a compliance certificate on or before March 1 of each year, beginning March 1, 2008, in compliance with Section 64.2009(e) of the Commission's rule.

Grande shall provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumer inability to opt-out is more than an anomaly.

5. Safeguards On The Disclosure of CPNI

Grande and its employees will take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Grande has established procedures and trains personnel so customers are properly authenticated before accessing CPNI based on customer-initiated telephone contact, online account access or an in-store visit, in accordance with Section 64.2010 (b)- (d) of the Commission's rules. Enterprise customers are assigned a separate customer service line and dedicated account representatives, and CPNI is provided only to authorized customer representatives, consistent with Grande's contracts.

Grande will authenticate a customer without the use of readily available biographical information or account information prior to the customer establishing a password or in the case of a lost or forgotten password. Authentication is accomplished through the use of a Personal Identification Number ("PIN"). The PIN is chosen by the customer or can be randomly generated and supplied to new customers at service initiation. For existing customers, PINs were mailed to the address of record. At the time of password creation, customers will establish a backup authentication method that does not prompt the customer for readily available biographical information or account information. Customers that cannot provide the correct password or the correct response to their backup authentication method must establish a new password as described in this paragraph.

Grande will notify the customer when there are account changes, such as change of password, response to secret questions, address of record. Grande may notify customer by voicemail to the telephone number of record, or by mail (postal or electronic) to the address of record.

Additional Protection Measures

Grande will take additional steps to protect the privacy of its customers' CPNI and to discover and protect against activity that is indicative of pretexting.

6. Notification of CPNI Security Breach Notification

Notification of law enforcement and customers

The Company has established policies and procedures to comply with the requirements of Section 64.2011 of the Commission's rules. Grande will notify law enforcement and customers within the required timeframes. A record of any breaches and required notifications will be kept for a minimum of two years and will include all information required by Rule 64.2011.

7. Recordkeeping

Grande's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. Grande maintains records of customer approval and disapproval for use of CPNI in a readily- available location that is consulted on an as- needed basis.

Grande will maintain separate files in which it will retain any court orders respecting CPNI.