

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

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

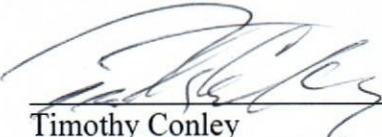
1. Date filed: February 25, 2019
2. Company covered by this certification: DCI-Design Communications LLC
3. Form 499 Filer ID: 831846
4. Name of signatory: Timothy Conley
5. Title of signatory: Chief Operating Officer
6. Certification:

I, Timothy Conley, certify that I am Chief Operating Officer of DCI-Design Communications LLC ("Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures, summarized in the attached statement, that are adequate to ensure compliance with the customer proprietary network information ("CPNI") rules as set forth in Part 64, Subpart U of the Commission's rules, 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 received any customer complaints in the past calendar year concerning unauthorized release of CPNI. The Company has not taken any actions in the past calendar year against data brokers, including proceedings instituted or petitions filed by the company at either state commissions, the court system or at the Commission.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject the Company to enforcement actions.



Timothy Conley
Chief Operating Officer
DCI-Design Communications LLC
Executed February 25, 2019

CPNI Compliance Policies of DCI-Design Communications LLC

The following summary describes the policies of DCI-Design Communications LLC ("DCI") that are designed to protect the confidentiality of Customer Proprietary Network Information ("CPNI") and to assure compliance with the rules of the Federal Communications Commission ("FCC") set forth in 47 C.F.R. Part 64, Subpart U, Section 2001 *et seq.* CPNI is "(A) information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier."

These policies are managed by DCI's CPNI Compliance Manager.

I. USE, DISCLOSURE OF, AND ACCESS TO CPNI

DCI will use, disclose, or permit access to individually identifiable CPNI only in its provision of the communications service from which such information is derived; for services necessary to, or used in, the provision of such communications service, including the publishing of directories; to initiate, render, bill and collect for communications services; to protect the rights or property of DCI, or to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services; to provide inside wiring installation, maintenance, or repair services; as required by law; or as expressly authorized by the customer.

DCI does not use CPNI to market service offerings among the different categories of service, or even within the same category of service, that it provides to subscribers. Although DCI's current policy is not to use CPNI for marketing, in the event that any employee or agent wishes to use CPNI for marketing or to seek customer approval for such use, such proposed use is subject to a supervisory review process that shall involve the CPNI Compliance Manager. If such use is approved, DCI shall modify these policies and conduct additional training as needed to assure compliance with the FCC's rules.

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

When DCI receives or obtains proprietary information from another carrier for purposes of providing a telecommunications service, it shall use such information only for such purpose, and shall not use such information for its own marketing efforts.

II. SAFEGUARDS AGAINST DISCLOSURE OF CPNI TO UNAUTHORIZED PARTIES

Above and beyond the specific FCC requirements, DCI will take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. If any employee becomes aware of new methods that are being used or could be used by third parties to attempt to obtain unauthorized access to CPNI, or of possible changes to DCI's existing policies that would strengthen protection of CPNI, they should report such information immediately to the CPNI Compliance Manager so that DCI may evaluate whether existing policies should be supplemented or changed.

A. Inbound Calls to DCI Requesting CPNI

CSRs may not disclose any CPNI to an inbound caller until the caller's identity has been authenticated.

More stringent protections apply to Call Detail Information (CDI), which includes any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any call. Even after a caller has been authenticated under the process above, DCI does not reveal CDI to an inbound caller. Instead, if an inbound caller requests CDI, DCI may offer to provide the requested CDI by sending the information by mail to a mailing address of record for the account, but only if such address has been on file with DCI for at least 30 days, or by calling back the customer at their telephone number of record.

B. Online Access to CPNI

At this time, DCI does not provide online access to CPNI. In the event that it offers such access in the future, it will implement authentication methods that are consistent with FCC rules.

C. In-Person Disclosure of CPNI

DCI does not routinely make CPNI available at its offices. However, in the event that a customer requests CPNI in person, DCI may disclose a customer's CPNI to an authorized person only upon verifying that person's identity through a valid, non-expired government-issued photo ID (such as a driver's license, passport, or comparable ID) matching the customer's account information.

D. Notice of Account Changes

Whenever a Customer's address of record is created or changed, DCI will send a notice to customer's prior address of record notifying them of the change. These notifications are not required when the customer initiates service. The notice provided under this paragraph will not reveal the changed information and will direct the customer to notify DCI if they did not authorize the change.

E. Business Customer Exemption

The authentication requirements for disclosure of CPNI do not apply to disclosure of business customer information by a dedicated account representative who knows through personal experience that the person requesting the information is authorized representative of the customer and that the contract between DCI and that business customer specifically addresses the protection of the customer's CPNI.

III. REPORTING CPNI BREACHES TO LAW ENFORCEMENT

Any DCI employee that becomes aware of any breaches, suspected breaches or attempted breaches must report such information immediately to the CPNI Compliance Manager. Such information must not be reported or disclosed by any employee to any non-employee, including the potentially affected customer, except in express conformance with the procedures described below. Any employee that fails to report such information will be subject to disciplinary action that may include termination.

It is DCI's policy that employees should not be discouraged from reporting information about breaches that may have been caused in part by their own actions or omissions. Once a breach has occurred, the most important objective is to attempt to limit the damage to our customers, make any adjustments as needed to prevent a recurrence of the breach, and to alert law enforcement promptly. Therefore, although employees who violate DCI's CPNI compliance procedures are subject to discipline, the sanctions may be substantially reduced where employees promptly self-report violations if appropriate.

A. Identifying a "Breach"

A "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI. If an employee has information about an incident and is not certain that the incident would not constitute a breach under this definition, the incident must be reported to the CPNI Compliance Manager.

If a DCI employee determines that an unauthorized person is attempting to gain access to CPNI but does not succeed at doing so, no breach has occurred. However, the incident must be reported to DCI's CPNI Compliance Manager who will determine whether to report the incident to law enforcement and/or take other appropriate action. The CPNI Compliance Manager will determine whether it is appropriate to update DCI's CPNI policies or training materials in light of any new information; the FCC's rules require DCI on an ongoing basis to "take reasonable measures to discover and protect against activity that is indicative of pretexting."

B. Notification Procedures

As soon as practicable, and in no event later than seven (7) business days upon learning of a breach, the CPNI Compliance Manager shall electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) by accessing the following link: <https://www.cpnireporting.gov>. DCI will not notify customers or disclose a breach to the public until 7 full business days have passed after notification to the USSS

and the FBI except as provided below, but will defer such notification at the request of either agency. If DCI receives no response from law enforcement after the 7th full business day, it must promptly proceed to inform the customers whose CPNI was disclosed of the breach.

IV. RECORD RETENTION

The CPNI Compliance Manager is responsible for assuring that we maintain for at least two years a record, electronically or in some other manner, of any breaches discovered, notifications made to the USSS and the FBI pursuant to these procedures, and notifications of breaches made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.

DCI maintains a record, for a period of at least one year, of those limited circumstances in which CPNI is disclosed or provided to third parties or where third parties were allowed access to CPNI. If DCI later changes its policies to permit the use of CPNI for marketing, it will revise its recordkeeping policies to comply with the Commission's recordkeeping requirements.

DCI maintains a record of all customer complaints related to their handling of CPNI, and records of DCI's handling of such complaints, for at least two years. The CPNI Compliance Manager will assure that all complaints are reviewed and that DCI considers any necessary changes to its policies or practices to address the concerns raised by such complaints.

DCI will have an authorized officer, as an agent of DCI, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that DCI has established operating procedures that are adequate to ensure its compliance with FCC's CPNI rules. The certificate for each year will be filed with the FCC by the first business day or on after March 1 of the subsequent year, and will be accompanied by a summary or copy of this policy that explains how DCI's operating procedures ensure that it is in compliance with the FCC's CPNI rules. In addition, the filing must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.

V. TRAINING

All employees with access to CPNI receive training on DCI's CPNI policies and are informed that (i) any use or disclosure of CPNI or other act or omission not in compliance with such policies will result in disciplinary action, including the termination of employment where appropriate, and (ii) employees who knowingly facilitate the unauthorized disclosure of a customer's confidential information may be subject to criminal penalties.