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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018

Date Filed: February 21, 2019

Names of companies covered by this certification:
Cincinnati Bell Telephone Company LLC, 499 ID # 805713
Cincinnati Bell Extended Territories LLC, 499 ID # 825068
CBTS Technology Solutions LLC, 499 ID # 809872

Name of signatory: **Christi H Cornette**

Title of signatory: **Chief Culture Officer**

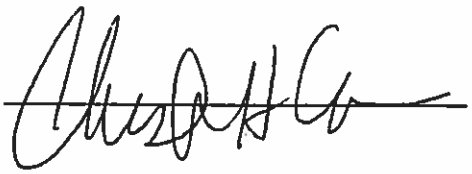
I, Christi Cornette, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001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

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, and the company does not have information to report with respect to the processes pre-texters are using to attempt to access CPNI.

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: Statement Regarding CPNI Operating Procedures

CINCINNATI BELL TELEPHONE COMPANY LLC
STATEMENT REGARDING CPNI OPERATING PROCEDURES
February 21, 2019

This statement is filed on behalf of Cincinnati Bell Telephone Company LLC (CBT), an incumbent local exchange carrier; and the following subsidiaries: CBTS Technology Solutions LLC, an interexchange carrier; and Cincinnati Bell Extended Territories LLC ("CBET"), a competitive local exchange carrier.

Employee Training Regarding Protection of CPNI

CBT continually educates and trains its employees on the appropriate use of customers' CPNI. As set forth in CBT's Corporate Policies Manual, it is the policy of CBT to protect the confidentiality of all CPNI in its possession in accordance with Section 222 of the Telecommunications Act of 1996. In addition, CBT's Code of Business Conduct states that employees are required to safeguard any proprietary information received from customers or potential customers as though it were the company's own information. Each year, salaried employees are required to sign a statement acknowledging that the employee has received a copy of the Code of Business Conduct and that the employee has been advised to read the code, become familiar with its contents and abide by the rules and principles set forth in it. Similarly, all hourly employees are provided a copy of the code and are instructed to read and become familiar with its contents. Supervisors of hourly employees are required to sign an attendance roster indicating that the hourly employees participated in awareness training and to submit the roster to the Human Resources Department. The Code of Conduct clearly states that breaches of the principles contained in the policy are grounds for disciplinary action, including dismissal, and may carry penalties under federal and state laws.

Use, Disclosure and Access to CPNI

CBT has adopted specific CPNI policies and procedures to ensure that CPNI is only used, disclosed or accessed to provide or market services among the categories of service to which the customer already subscribes except as permitted by Section 222(d) of the Act and Section 64.2005 of the Commission's rules or where CBT has the customer's approval in accordance with Rule 64.2007. More specifically, CBT has implemented a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI, and CBT's sales consultants are trained to recognize when a customer has or has not approved of the use CPNI for marketing purposes as indicated by the customer's service record. If a customer has not previously approved of the use of CPNI for marketing purposes, either by opt-in or opt-out approval, sales consultants are trained to request the customer's permission to access the customer's records for the duration of the call or in-store visit as necessary.

CBT maintains a record of customers' approval or disapproval to use, disclose or permit access to a customer's CPNI for marketing purposes. A customer's approval or disapproval remains in effect until the customer revokes or limits the approval or disapproval. CBT maintains a record of such CPNI approval or disapproval for a minimum of one year.

Notice Required for Use, Disclosure, or Access to CPNI

CBT policies require that customers be notified of their rights and of the company's legal obligations with respect to CPNI prior to solicitation of customer approval. CBT provides notice to customers containing the disclosures required in Section 64.2008 of the Commission's rules.

Safeguards Required for Use, Disclosure, or Access to CPNI

CBT complies with the Commission's requirement to establish a supervisory review process for outbound marketing processes. Specifically, marketing personnel must submit a request to obtain customer information in order to conduct an outbound campaign. The request must indicate the parameters of the data sought other key information about the campaign, as well as by whom the request is made. The information requested is retrieved by designated personnel and scrubbed to eliminate customers who elect not to share CPNI or who have requested to be placed on the company's do-not-call/contact list. CBT maintains a record of all sales and marketing campaigns that use customers' CPNI as required by Section 64.2009 of the Commission's rules.

CBT takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the use of reasonable and proper authentication processes to identify a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or an in-store visit. CBT's policies prohibit a sales representative from disclosing call detail information over the phone, based on a customer-initiated telephone contact. Sales representatives are instructed to direct customers to obtain call detail via online account access or to mail the customer a duplicate bill to the street address of record. CBT has also implemented an authentication process for establishing online account access to call detail information without the use of readily available biographical information or account information. Finally, CBT policies require a customer to provide a photo ID to obtain access to CPNI/call detail information at CBT's retail store locations.

CBT has established a process for adding passwords to new and existing customer accounts without the use of readily available biographical information or account information. A customer who forgets an account password is required to present a photo ID at a retail store location to obtain access to CPNI, to make account changes, or to change a forgotten password.

CBT has also established a process for notifying customers of certain account changes as required by Section 64.2010(f) of the Commission's rules.

Notification of CPNI Security Breaches

CBT has polices and procedures in place to ensure compliance with Section 64.2011 of the Commission's rules. Sales representatives as well as network security personnel are directed to notify CBT's Security Office if it they reasonably believe that a CPNI breach has occurred. CBT will notify law enforcement and its customers of the breach in accordance with the rule, and a record of the breach will be maintained for two years.