

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

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: February 28, 2018
2. Name of company covered by this certification: Curatel, LLC
3. Form 499 Filer ID: 823068
4. Name of signatory: Francisco Moreno
5. Title of signatory: Vice President - Corporate Finance
6. Certification:

I, Francisco Moreno, certify that I am an officer of Curatel, LLC ("Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures, as 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 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.



Francisco Moreno
Vice President - Corporate Finance
Curatel, LLC
Executed February 28, 2018

CPNI COMPLIANCE POLICIES OF CURATEL, LLC

Curatel, LLC (“Curatel”) has implemented the following policies and procedures 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.”

I. USE, DISCLOSURE OF, AND ACCESS TO CPNI

Curatel 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 telecommunications services; to protect the rights or property of Curatel, or to protect users or other carriers or service providers from fraudulent or illegal use of, or subscription to, such services; to market services within the package of services to which the customer already subscribes, including, for local exchange customers, to market services formerly known as adjunct-to-basic services (such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features); to provide inside wiring installation, maintenance, or repair services; as required by law (such as pursuant to a valid request from law enforcement or a court order or other appropriate authority); or as expressly authorized by the customer.

Curatel does not use a customer’s CPNI for marketing except as set forth above. 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, Curatel shall modify these policies and conduct additional training as needed to assure compliance with the FCC’s rules.

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

When Curatel 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, Curatel will take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. The FCC's rules require carriers on an ongoing basis to "take reasonable measures to discover and protect against activity that is indicative of pretexting." 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 Curatel's existing policies that would strengthen protection of CPNI, they should report such information immediately to Curatel's CPNI Compliance Supervisor so that Curatel may evaluate whether existing policies should be supplemented or changed.

A. Personal Identification Numbers

When a customer establishes new service, they are asked to choose a personal identification number (PIN), and are advised not to choose a PIN that consists of any of their account or biographical information, such as their telephone number, address, social security number, date of birth, or easily guessed numbers such as 1111. Customers may contact Curatel to request a new PIN if they have forgotten or want to change their PIN. In such event, Curatel will send a new PIN to an address of record that has been on file for at least 30 days, or it can provide a new PIN to an inbound caller after such caller has been authenticated using a code provided in an invoice previously sent to the customer's address of record, or it can provide a PIN to a person providing photo identification in accordance with subsection D below.

B. Inbound Calls to Curatel Requesting CPNI

Call Detail Information (CDI) 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. Curatel will not provide CDI to an inbound caller except under the following conditions:

- A CSR can reveal CDI if the caller provides their PIN.
- If an inbound caller does not know the PIN for the account but is able to provide to the CSR the telephone number called, when it was called, and, if applicable, the amount charged for the call, exactly as that information appears on the bill, then the CSR is permitted to discuss customer service pertaining to that call and that call only. If the detail provided by the caller does not match on all categories, the CSR is trained to not inform the caller which portion of the detail does not match (for example, they should not tell the customer there were no calls during a particular hour or that there are no calls to a particular number).
- The CSR may offer to call the caller back at the customer's telephone number of record. The CSR may not rely on Caller ID information to assume that the caller is calling from such number; they must disconnect the inbound call and make a new outbound call to that number.

- The CSR may offer to send a copy of a bill or requested CDI to a mailing address of record for the account, but only if such address has been on file with Curatel for at least 30 days.

For CPNI other than CDI, CSRs are trained to require an inbound caller to authenticate their identity prior to revealing any CPNI or account information to the caller.

C. Online Access to CPNI

To access CPNI using Curatel's online portal, Customer must provide their PIN.

D. In-Person Disclosure of CPNI at Curatel Offices

Curatel may disclose a customer's CPNI to an authorized person visiting a Curatel office 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.

E. Notice of Account Changes

When a PIN is created or changed, Curatel will send a notice to customer's address of record notifying them of the change. When an address of record is created or changed, Curatel will send a notice to customer's former address of record notifying them of the change. These notice requirements do not apply when the customer initiates service. Each of the notices provided under this paragraph will not reveal the changed information and will direct the customer to notify Curatel immediately if they did not authorize the change.

III. REPORTING CPNI BREACHES TO LAW ENFORCEMENT

A "breach" has occurred when any person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI. Any Curatel employee that becomes aware of any breaches, suspected breaches or attempted breaches of CPNI must report such information immediately to the Curatel CPNI Compliance Supervisor, and must not report or disclose such information by any employee to any non-employee, including the potentially affected customer, except in express conformance with the procedures described below. As soon as practicable, and in no event later than seven (7) business days upon learning of a breach of CPNI, the Curatel CPNI Compliance Supervisor 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>. Curatel's FRN number and password may be required to submit a report.

Curatel 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. (A full business day does not count a business day on which the notice was provided.) Federal law requires compliance with this requirement even if state law requires disclosure.

If Curatel 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 Curatel Compliance Supervisor is responsible for assuring that the company maintains 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.

Curatel maintains a record, for a period of at least one year, of: (1) those limited circumstances in which CPNI is disclosed or provided to third parties, or where third parties were allowed access to CPNI (pursuant to a valid request from law enforcement, court order or other appropriate authority); (2) of supervisory review of outbound marketing that proposes to use CPNI or to request customer approval to disclose CPNI; and (3) its sales and marketing campaigns that use its customers' CPNI, including a description of each campaign, the specific CPNI that was used in the campaign, and the products and services offered as a part of the campaign.

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

Curatel will have an authorized corporate officer, as an agent of the company, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that Curatel 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 March 1 of the subsequent year, and will be accompanied by a summary or copy of this policy that explains how Curatel'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 such access receive a copy of Curatel'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. In addition, Curatel requires CPNI training for all CSRs, personnel at retail offices that may receive requests for CPNI, and marketing personnel.