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February 28, 2019

**Via Electronic Submission**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
12<sup>th</sup> Street Lobby – TW-A325  
Washington, D.C. 20554

**Re: AT&T Annual CPNI Compliance Certification for Calendar Year 2018  
EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), AT&T, on behalf of the attached list of operating entities, hereby submits its CPNI compliance certification for calendar year 2018 via the Commission's Electronic Comment Filing System.

Should you have any questions, feel free to contact me.

Sincerely,

**/s/ Jacquelyne Flemming**  
Jacquelyne Flemming

Attachment A – List of AT&T Operating Entities

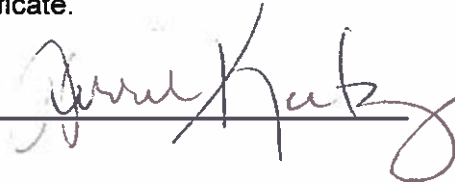
Attachment B – Summary of Customer Complaints & Actions Taken Against Data Brokers

**AT&T Inc. CPNI Certification  
Calendar Year 2018**

Date: February 25, 2019

1. I, Jerrie Kertz, Senior Vice President – Compliance, hereby certify based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. I certify that as of December 31, 2018, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: \_\_\_\_\_

A handwritten signature in purple ink, appearing to read "Jerrie Kertz", is written over a horizontal line.

## **EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2018**

Below is an explanation of how the operating procedures established by AT&T Inc. ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a recurrence.

**A. Customer CPNI Approvals.** To the extent applicable, each organization within AT&T has:

1. Established and distributed methods and procedures (M&Ps) whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under CPNI Rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).
2. Established and distributed M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).

3. Established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).
4. Established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).
5. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b) and (c).
6. Maintained an IVR, toll-free number, and website whereby customers, at no additional cost, could avail themselves of an "opt-out" method. The IVR and voice mail were available 24 hours a day, seven days a week. See 47 C.F.R. §64.2008(d)(3)(v).
7. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one-time use of a customer's CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).
8. Established M&Ps or implemented systems to clearly establish the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

**B. Training and Discipline.** To the extent applicable, each organization within AT&T has:

1. Trained all personnel who have access to customer data or who have outbound marketing responsibilities. In addition, each organization appropriately provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings.

Further, vendors have contractual obligations to follow the CPNI Rules and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).

2. Maintained a policy requiring compliance with CPNI Rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI Rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

**C. CPNI Complaints and Breaches.** AT&T has:

1. Established and maintained a mechanized tracking tool for customer complaints regarding the unauthorized release of CPNI information. This tool is included in methods and procedures as well as training programs in order to increase awareness to all employees. See 47 C F R. §64.2009(e).

2. Requires all relevant employees to: (a) make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

3. Established methods and procedures to manage reporting CPNI breaches to the Federal Bureau of Investigation (FBI) and United States Secret Service (USSS) central reporting facility. See 47 C.F.R. §64.2011(a), and (b).

4. Established methods and procedures for notifying customers of a CPNI breach. (See 47 C.F.R. §64.2011(c))

5. Developed methods and procedures to ensure personnel maintain records of CPNI breaches including, 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. These records are retained for a minimum of two (2) years. See 47 C.F.R §64.2011(d).

**D. Security and Authentication.** To the extent applicable, each organization within AT&T has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before disclosure of CPNI for all applicable points of access. See C.F.R. § 64.2010(a)(b)(c)(d).
2. Established methods and procedures prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(e).
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010(c) and (e).
4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010(f).

**E. Sales and Marketing Campaigns.** To the extent applicable, each organization within AT&T has:

1. Maintained a record for at least one year, of all approved marketing campaigns, including a description of the campaign, the type of CPNI used, and the products and services offered. See 47 C.F.R. §64.2009(c).
2. Established a supervisory review process for all outbound marketing campaigns to ensure all sales and marketing campaigns that propose to use CPNI are reviewed and approved. All proposed outbound marketing campaigns, requests for use of CPNI, and requests for marketing lists and customer data are submitted for review and require supervisory approval. See 47 C.F.R. § 64.2009(d).

**F. Customer Notice for Use of CPNI.** AT&T has:

1. Established a process whereby customers are notified of their right to restrict use of, disclosure of, and access to CPNI. Additionally, the customer notification provides sufficient information and in a manner consistent with 47 C.F.R. §64.2008(c1-c10) to enable the customer to make an informed decision on whether to permit a carrier access to their CPNI. Additionally, a record of this notification is maintained for at least one year. See 47 C.F.R. §64.2008(a)(b)(c).
2. Established a process to notify customers to obtain opt-out approval through electronic or written methods in accordance with 47 C.F.R. §64.2008(d). Such

notification is consistent with requirements in 47 C.F.R. §64.2008(c1-c10). Additionally, a 45-day waiting period is provided after giving notice to the customer of the opportunity to Opt-out before assuming customer approval to use, disclose, or permit access to CPNI. See 47 C.F.R. §64.2008(d)(1).

3. Established a mechanized process to notify customers when account changes such as password, address of record, and online account occur, and when back-up passwords are established. See 47 C.F.R. §64.20010(f).

**AT&T Entities**

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

Entity Name	FRN
Acadiana Cellular General Partnership	0001837814
Alascom, Inc.	0001572676
Allied Wireless Communications (Oh), LLC	0019981380
AT&T Communications of Indiana, LLC	0012838421
AT&T Communications of New York, Inc.	0012838462
AT&T Communications of Texas, LLC	0016657918
AT&T Communications of Virginia, LLC	0012838546
AT&T Corp.	0005937974
AT&T Mobility LLC	0004979233
AT&T Mobility of Galveston LLC	0016658122
AT&T Mobility Puerto Rico Inc.	0003473709
AT&T Mobility Spectrum LLC	0014980726
AT&T Mobility USVI Inc.	0004499034
AT&T Mobility Wireless Operations Holdings Inc.	0020078887
AT&T of Puerto Rico, Inc.	0001731462
AT&T of The Virgin Islands, Inc.	0003464344
AT&T Wireless Services 3 LLC	0023910920
Bellsouth Long Distance, Inc.	0003733318
Bellsouth Telecommunications, LLC	0020882668
Bristol Bay Cellular Partnership	0001568898
Chattanooga MSA Limited Partnership	0001842723
Cingular Wireless of Texas RSA #11 Limited Partnership	0003294048
Cingular Wireless of Texas RSA #16 Limited Partnership	0003294006
Cricket Wireless LLC	0022720445
FiberTower Spectrum Holdings, LLC	0023187016
FiberTower Spectrum Holdings, LLC	0019211895
Florida RSA No. 2b (Indian River) Limited Partnership	0001837566
Houma-Thibodaux Cellular Partnership	0004547931
Illinois Bell Telephone Company	0002860856
Indiana Bell Telephone Company, Incorporated	0002904654
Lafayette MSA Limited Partnership	0001682509
Lake Mobility LLC	0022683619
Leap Wireless International, Inc.	0002963528
Louisiana RSA No. 7 Cellular General Partnership	0001837798
Louisiana RSA No. 8 Limited Partnership	0001837830



**AT&T Entities**

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

Entity Name	FRN
Lubbock SMSA Limited Partnership	0001650787
LWI Holdco, Inc.	0024251175
Madison SMSA Limited Partnership	0002842060
Mcallen-Edinburg-Mission SMSA Limited Partnership	0001658467
Michigan Bell Telephone Company	0002776771
Milwaukee SMSA Limited Partnership	0002846293
Missouri RSA 11/12 Limited Partnership	0001658418
Missouri RSA 8 Limited Partnership	0001658442
Missouri RSA 9B1 Limited Partnership	0001658426
NE Acquisition Company LLC	0027539568
Nevada Bell Telephone Company	0001552173
New Cingular Wireless PCS, LLC	0003291192
New Cingular Wireless Services, Inc.	0004122032
NEWN Acquisition Company LLC	0027726934
Northeastern Georgia RSA Limited Partnership	0001837152
Ohio RSA 2 Limited Partnership	0002837094
Ohio RSA 5 Limited Partnership	0002837110
Ohio RSA 6 Limited Partnership	0002837136
Oklahoma City SMSA Limited Partnership	0001658392
Oklahoma Independent RSA 7 Partnership	0010698884
Oklahoma RSA 3 Limited Partnership	0001658376
Oklahoma RSA 9 Limited Partnership	0001658368
Orlando SMSA Limited Partnership	0001843036
Pacific Bell Telephone Company	0001551530
Santa Barbara Cellular Systems, Ltd.	0004312898
SBC Long Distance, LLC	0003763497
Southwestern Bell Telephone Company	0016627473
TC Systems, Inc.	0012833513
Teleport Communications America, LLC	0022315121
Texas RSA 18 Limited Partnership	0001666072
Texas RSA 19 Limited Partnership	0001666056
Texas RSA 20B1 Limited Partnership	0001665058
Texas RSA 6 Limited Partnership	0001665991
Texas RSA 7B1 Limited Partnership	0001666007
Texas RSA 9B1 Limited Partnership	0001666023
Texas RSA No. 2 Limited Partnership	0004550547

**AT&T Entities**

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

Entity Name	FRN
The Ohio Bell Telephone Company	0002946986
Tide Mobility LLC	0022415855
Topeka SMSA Limited Partnership	0001658632
Wireless Maritime Services, LLC	0021654355
Wisconsin Bell, Inc.	0002716561

**ATTACHMENT B**  
**AT&T CY2018 CPNI Certification**

**Summary of Customer Complaints and  
Actions Taken Against Data Brokers**

**Summary of Customer Complaints**

As required by 47 C.F.R. §64.2009(e), following is a summary of customer complaints concerning the unauthorized release of Customer Proprietary Network Information (CPNI) received by AT&T Inc. from January 1, 2018 to December 31, 2018:

<b>CPNI Complaint Category</b>	<b>Number of Customer Complaints 2018</b>
<b>Unauthorized access or disclosure by an AT&amp;T employee or AT&amp;T agent</b>	425
<b>Accessed online by an unauthorized third party (i.e. not by an AT&amp;T employee/agent)</b>	37
<b>Disclosed to an unauthorized third party (i.e. not to an AT&amp;T employee/agent)</b>	35
<b>TOTAL</b>	<b>497</b>

**Summary of Actions Taken Against Data Brokers**

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 in the past year.