

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date filed: February 27, 2018

Name of company(s) covered by this certification: Telmex USA, L.L.C.

Form 499 Filer ID: 819922

Name of signatory: Luis Segovia

Title of signatory: Controller

I, Luis Segovia, 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 CFR § 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, safeguards, 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. proceeding 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 CFR § 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 U.S. Code and may subject it to enforcement action.

Signed \_\_\_\_\_



**Statement explaining  
Customer Proprietary Network Information procedures for TELMEX USA, L.L.C.**

Telmex USA, L.L.C. has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in 47 CFR § 64.2001 *et seq.*

**CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")**

CPNI includes information 1) that relates to the quantity, technical configuration, type, destination, location and amount of use of telecommunications service subscribes 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 2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information, which is customer information published in a telephone directory, such as customer name, address, and telephone number.

**UTILIZATION OF CPNI**

- (1) The Company obtains and utilizes CPNI solely for the purpose of providing services to its customers, billing its customers for its services, collecting payment for its service, and maintenance and repair of services. Where necessary, the Company may use, disclose or permit accesses to CPNI to protect its rights or property or the rights or property of its underlying carrier, to protect users of its services and other carriers from fraudulent, abusive, unlawful use of or unlawful subscription to its services.
- (2) The Company uses, discloses, or permits access to CPNI to provide or market service offerings among the category of service to which the customer already subscribes.
- (3) The Company does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers or for any other purpose that is prohibited by FCC's rules.
- (4) Without Customer approval, the Company does not use, disclose or permit access to CPNI to provide or market service offerings within a category of service that the Customer does not already subscribe in accordance with the FCC's rules.

**COMPANY SERVICES PROVISION**

Telmex USA, L.L.C. ("the Company") provides global facilities-based and global resale services (private service provider). The Company does not provide presubscribed 1+ domestic long distance service.

**CONFIDENTIALITY OF CARRIER INFORMATION**

A proprietary information that the Company receives from another carrier for purposes of providing any telecommunications service shall use such information only for such purpose, and shall not use such information for its own marketing efforts.

## **SAFEGUARDS**

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. The Company will notify the FCC if the discovers any new methods of pretexting and of any actions it takes against pretexters and data brokers.

### **1. CUSTOMER AUTHENTICATION**

All customer information is maintained in password-protected database that can be accessed only by authorized employees such as dedicated account representatives. Authorized employees may access CPNI to address customer questions only when the person calling is listed as an “authorized contact” for the business customer. Changes to and release of information for customer account records such as address, phone numbers or services must be requested by an authorized customer contact in accordance with the provisions of the customer’s contract. All such requests are verified by the Company. Although the Company has not implemented passwords for the non-business customer, the Company will release call detail information based on customer-initiated telephone contact, if (1) a customer requests that the information be sent to the customer’s address of record; or (2) the Company calls the telephone number of record and discloses the information, or (3) the customer can provide specific details of the call relevant to the customer service issue. If the customer cannot provide the relevant call detail information, the Company only provides the call detail information by calling the customer at the telephone number of record or mailing the information to the address of record. The company does not currently provide online access to customers.

### **2. CPNI DISCLOSURE TO THIRD-PARTIES**

The Company does not disclose CPNI of its current or former customers to any third-party except as required by law or regulation, or under confidentiality agreements in accordance with FCC rules, or upon customer request.

### **3. NOTICE OF UNAUTHORIZED DISCLOSURE OF CPNI**

The Company has not encountered any breaches occur during the year of 2017 and follows the rule to notify as soon as practicable (and in no event more than seven (7) days) after the Company discovers that a person (without authorization exceeding authorization) has intentionally gained access to, used or disclosed CPNI, The Company will provide electronic notification of the breach within seven business days to the United States Secret Service (“USSS”) and the Federal Bureau of Investigation (“FBI”) via the following web site, [www.fcc.gov/eb/CPNI](http://www.fcc.gov/eb/CPNI). In order to allow law enforcement time to conduct an investigation, The Company will wait another seven business days before notifying the affected customers of the breach (unless the USSS and FBI request The Company to postpone disclosure) The Company will maintain records of discovers breaches for at least seven years.

### **4. CUSTOMER PROPRIETARY NETWORK INFORMATION (“CPNI”)**

CPNI includes information 1) that relates to the quantity, technical configuration, type, destination, location and amount of use of telecommunications service subscribes 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 2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information, which is customer information published in a telephone directory, such as customer name, address, and telephone number.

**5. MARKETING PROCEDURES**

The Company markets its services solely through direct sales. The Company does not use CPNI for marketing purposes and therefore does not have to maintain records regarding marketing campaigns that use its customers' in CPNI.

**6. TRAINING AND DISCIPLINE**

The Company prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law. The Company trains its employees in the authorized use of all customer information including CPNI. Any employee that discloses confidential customer information including CPNI is subject to disciplinary action and possibly termination.

**ADDITIONAL SAFEGUARDS**

\*\* The Company has established a supervisory review process designed to endure compliance with FCC'S CPNI rules.