**Thales Avionics, Inc.**

1110 West Hibiscus Blvd

Melbourne, FL 32901 USA

February 28, 2019

**VIA ECFS**

Marlene H. Dortch, Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

**Re:** **EB Docket No. 06-36**

**Thales Avionics, Inc., f/k/a LiveTV Satellite Communications, LLC; Form 499 Filer ID: 830196**

**CPNI Compliance Certification for Calendar Year 2018**

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 64.2009(e), please find attached the CPNI compliance certification covering calendar year 2018 for Thales Avionics, Inc., f/k/a LiveTV Satellite Communications, LLC.

Through an internal restructuring consummated on December 31, 2017, LiveTV Satellite Communications, LLC merged into its sister entity, Thales Avionics, Inc. (“Thales Avionics”). Following this *pro forma* transaction, Thales Avionics provides (among other services) the services previously provided by LiveTV, which are described in the explanatory attachment submitted herewith, and utilizes the same CPNI compliance procedures that LiveTV utilized during the 2018 calendar year. Additionally, Thales Avionics has assumed LiveTV’s Form 499 Filer ID: 830196.

Please contact the undersigned at (321) 312-7048 should you have any questions regarding this submission.

Respectfully submitted,

*/s/* ***Pasquale Amodio***

Pasquale Amodio

Thales Avionics, Inc.

Thales USA, Inc.

Senior Director - Regulatory Compliance

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

Accompanying Statement explaining CPNI procedures

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**Thales Avionics, Inc., f/k/a LiveTV Satellite Communications, LLC**

**CPNI Compliance Certification for Calendar Year 2018**

**Explanatory Attachment**

Thales Avionics, Inc., f/k/a LiveTV Satellite Communications, LLC (“Thales Avionics”) is a provider of Iridium Satellite internet access and Iridium telephone voice services to businesses that own and operate business aircraft. Thales Avionics provides this statement pursuant to 47 C.F.R. § 64.2009(e) to explain its policies, practices, and procedures designed to ensure compliance with Section 222 of the Communications Act, 47 U.S.C. § 222, and the Federal Communications Commission’s rules, 47 C.F.R. §§ 64.2001-64.2011, governing customer proprietary network information (“CPNI”).

It is Thales Avionics policy not to use, disclose to an affiliate or third party, or permit an affiliate or third party to access CPNI without customer approval except: (1) as required by law, such as in response to a lawfully issued subpoena; (2) for the limited purpose of initiating, rendering, billing, maintaining, and/or collecting for Thales Avionics services; or (3) to protect the rights or property of Thales Avionics, or to protect users of Thales Avionics services from fraudulent, abusive, or unlawful use of, or subscription to, such services.

Other than the exceptions noted above, it is Thales Avionics policy not to use, disclose to an affiliate or third party, or permit an affiliate or third party to access CPNI for any purpose, including for any marketing purpose. Should Thales Avionics change this policy, it will establish procedures to ensure compliance with the notice and approval requirements governing the use or disclosure of CPNI—including, but not limited to, notification to customers of their right to restrict the use of, disclosure of, and access to their CPNI—and the recordkeeping and supervisory review requirements, including those associated with outbound sales and marketing campaigns.

Thales Avionics customers are able to access their CPNI only through secure online account access. It is Thales Avionics policy not to provide online access to CPNI until the customer requesting such access provides a password that the customer has created without being prompted for the use of readily available biographical or account information. If the customer has lost or forgotten the password, the customer must provide the correct response to a back-up means of authentication that is not based on readily available biographical or account information. Thales Avionics notifies customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

All Thales Avionics employees are required to sign a confidentiality agreement that obligates them to protect CPNI. Thales Avionics has trained its employees that have access to CPNI on the limited purposes for which they are authorized to use CPNI, and those employees attend refresher training at least every other year. A violation of Thales Avionics policies, practices, and procedures with respect to CPNI will result in disciplinary action which may include immediate dismissal without warning.

It is Thales Avionics policy to notify law enforcement of a breach of its customers’ CPNI as soon as practicable, and in no event later than seven business days, after reasonable determination of the breach. Thales Avionics will not notify customers or disclose the breach to the public until seven full business days have passed after notification to law enforcement, except when it believes there is an extraordinarily urgent need, and after consultation with, and in cooperation with, the relevant investigating agency. Thales Avionics will delay notification to customers or the public if directed to do so in writing by the relevant investigating agency. Thales Avionics will maintain a record of any discovered breaches and notifications made for at least two years.