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February 28, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W. TW-A325
Washington, DC 20554

**Re: EB Docket No. 06-36
Annual Certification of TDS Broadband Service LLC**

Dear Ms. Dortch:

TDS Broadband Service LLC (“TDS Broadband”), by its attorneys, hereby files its annual CPNI certification pursuant to the requirements of Section 64.2009(e) of the Commission’s rules.

This submission has been redacted for public inspection, as permitted by the Report and Order released by the Commission in the above-referenced docket on April 2, 2007. *See Telecommunications Carriers’ Use of Customer Proprietary Network Information and Other Customer Information*, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927, 6954 n.167 (2007). A confidential, unredacted version of this submission will be filed today by hand.

Any questions concerning this submission should be addressed to the undersigned.

Respectfully submitted,

Matthew S. DelNero
Thomas G. Parisi
Counsel for TDS Broadband

Enclosure

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2018 Calendar Year
EB Docket No. 06-36

Companies covered by this certification: TDS Broadband Service LLC and wholly owned subsidiaries as of December 31, 2018 ("*TDS Broadband*" or "*Company*").

Form 499 Filer IDs: Please see the attached list.

Signatory Name: Mark E. Barber

Signatory Title: Senior Vice President - Network Operations


I, Mark Barber, certify that I am a TDS Broadband officer, acting as an agent of the Company, and that I have personal knowledge that TDS Broadband 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 TDS Broadband's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

TDS Broadband has not taken actions (*i.e.*, 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.

The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

Signed:



Date Signed:

Feb 27, 2019

TDS Broadband Statement Explaining CPNI Procedures

This statement accompanies the annual certification of TDS Broadband or the "Company" as required by 47 C.F.R. § 64.2009(e). It describes TDS Broadband's operating practices, procedures, systems, processes, and controls designed to ensure compliance with the Commission's CPNI rules.

A. Approval Required for Use of CPNI

Consistent with the Commission's rules, TDS Broadband may use CPNI to market service offerings to customers that are within the category of service to which the customer already subscribes ("Total Service Approach") or to market services formerly known as adjunct-to-basic services. TDS Broadband's operating practices are not designed to use, disclose, or allow access to CPNI for any purpose requiring customer approval under the FCC's rules found at 47 C.F.R. § 64.2007.

B. Safeguards for CPNI Use

TDS Broadband educates and trains its employees regarding the appropriate use and disclosure of CPNI. Company policies are shared in written form with all employees. Upon hire and after reviewing these policies, employees must acknowledge that they have read and understand them. In addition, the Company maintains a CPNI training program which includes training all new employees on CPNI and an annual refresher course for existing employees. Further, employees who function in a customer advisory role such as customer care representatives are provided with further guidance, in the form of company procedures, on the proper handling of CPNI. Adherence to procedure is tested through call monitoring, and where issues are identified, they are escalated and resolved, as appropriate.

C. Safeguards Against CPNI Disclosure

TDS Broadband takes reasonable measures to discover and protect against attempts by unauthorized third parties to gain access to customer CPNI by securing its network, using password systems, using notification systems, and monitoring for unauthorized access.

The TDS Broadband enterprise networks¹ are protected

It is TDS Broadband's practice to authenticate in-bound callers using either a password or an account-based method. If a caller wishes to discuss sensitive information including call detail records, the caller is either password authenticated, the call is ended and the customer called back at his/her telephone number of record, or the customer is either redirected to an on-line system or asked to come to the office and present a valid photo identification to receive information. Otherwise, in accordance with procedures, customer care representatives may use account-based authentication to discuss less sensitive information. Adherence to these procedures is tested through call monitoring, and where issues are identified they are escalated and resolved, as appropriate.

¹ In late 2017, TDS Broadband Service LLC completed the acquisition of Crestview Cable Communications. In 2018 some aspects of the Crestview network relevant to CPNI were not integrated into the Company enterprise network. That network is secured using access control methods such as limiting physical access and passwords.

TDS Broadband maintains processes and systems designed to notify customers when passwords, online accounts, or addresses of record are changed. The company uses multiple processes and systems designed to trigger notices when changes occur and send notices in a timely fashion using email or letters directed to the address of record. As required by 47 C.F.R. § 64.2010(f), notifications do not reveal the changed information.

D. Notification of CPNI Breaches

TDS Broadband maintains processes through which employees or customers can report a possible breach, including but not limited to unauthorized access to or use of CPNI. If a report indicating that CPNI breach may have occurred, or if a potential breach is detected through the monitoring processes discussed above, the event is investigated. If a breach were to occur, TDS Broadband's practice requires that breach to be reported to law enforcement and to the customer in accordance with the Commission's rules.

It is TDS Broadband's practice to maintain its records of any breaches reported for at least two years.

State	TDS Entity	499 Filer ID
AZ	TDS Broadband Services, LLC	826819
CO	TDS Broadband Services, LLC	826819
NM	TDS Broadband Services, LLC	826819
NV	TDS Broadband Services, LLC	826819
OR	TDS Broadband Services, LLC	826819
TX	TDS Broadband Services, LLC	826819
UT	TDS Broadband Services, LLC	826819