

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

EB Docket 06-36

Annual 47 C.F.R. §64.2009(e) CPNI Certification for 2018 covering the prior calendar year, January 1, 2018 through December 31, 2018.

Date filed: March 1, 2019

Name of company covered by this certification: Charter Communications, Inc.

Form 499 Filer IDs: 820201; 821400; 822294; 823164; 823166; 823418; 823420; 823422; 823746; 823750; 823754; 823760; 823764; 823774; 823776; 823806; 823854; 823856; 823858; 823864; 823998; 824000; 824006; 824016; 824018; 824020; 824026; 824408; 824478; 824704; 825038; 825088; 825350; 825351; 825451; 825452; 825461; 825472; 826535; 826610; 826652; 827249; 827517; 828505; 828822; 829586; 829598; 829599; 829600; 829601; 829602; 829603; 829604; 829605; 829606; 829607; 829608; 829609; 829610; 829611; 829612; 829613; 829614; 829615; 829616; 829617; 829618; 829619; 829620; 829621; 829622; 829623; 829874; 829876; 829877; 829925; 830063; 830439; 830925; 831569; 831570; and 832346.

Name of signatory: John R. Bickham

Title of signatory: President and Chief Operating Officer

Certification:

I, John R. Bickham, 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 Charter Carrier Entities¹ (collectively referred to as “Charter” or the “Company”) have established operating procedures that are adequate to ensure compliance with the Federal Communications Commission’s (the “Commission”) customer proprietary network information (“CPNI”) rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how Charter’s procedures are designed to 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.


¹ As used in this Certification, the term “Charter Carrier Entities” shall mean any of Charter Communications, Inc.’s wholly-owned direct or indirect domestic subsidiaries that are subject to the requirements of the FCC’s CPNI rules. *See* 47 C.F.R. §§ 9.3, 64.2003(o). The Form 499 Filer IDs of these entities are listed above.

The Company has not taken any 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.

For the time period beginning January 1, 2018 and continuing through and including December 31, 2018, Charter received sixty-seven (67) customer inquiries involving the alleged unauthorized release of CPNI. See attached accompanying statement.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 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 the U.S. Code and may subject it to enforcement action.

By: Charter Communications, Inc.

Signed: 
John R. Bickham
President and Chief Operating Officer

Attachments: Accompanying statement explaining CPNI procedures and summary of customer complaints

**STATEMENT CONCERNING PROCEDURES
ENSURING COMPLIANCE WITH CPNI REGULATIONS
AND REPORT ON UNAUTHORIZED DISCLOSURE OF CPNI/PRETEXTING**

Charter, as defined above, has implemented internal operating procedures and practices designed to ensure compliance with the FCC's rules, 47 C.F.R. § 64.2001, *et seq.*, governing the use and disclosure of CPNI. Following is a brief explanation of the procedures Charter currently employs, as well as summary of the actions taken against pretexters and customer complaints received in the prior year involving allegations of unauthorized disclosure of CPNI:

1. As to the use of CPNI for marketing purposes, it is Charter's current policy not to use CPNI for the purpose of marketing service offerings among the different categories of service that Charter provides to subscribers. Charter does not disclose CPNI to any joint venture partners or independent contractors for marketing purposes.

2. Except as described in paragraph (3) below, Charter only releases or discloses CPNI to a third party with the customer's consent or pursuant to a valid request from law enforcement, the federal judiciary or other appropriate authority.

3. It is Charter's policy only to release CPNI to third-party vendors pursuant to a written agreement containing the appropriate restrictions regarding the confidentiality and safeguarding of customer information, and then only for the limited purpose of initiating, rendering, billing and/or collecting for services rendered to Charter's subscribers.

4. Charter's customer service representatives ("CSRs") are trained as to when they are and are not authorized to disclose call detail information over the telephone, and do not discuss call detail information with a customer unless (a) the customer has been authenticated by providing a CSR with an accurate security code or other shared secret without the use of readily available biographical information or account information, or (b) the customer provides call

detail information to the CSR first.²

5. Charter does not provide online access to any CPNI until the customer requesting such access provides a password that has been established by the customer without the use of readily available biographical information or account information.

6. Charter does not disclose CPNI to a customer at a retail location until the customer presents a valid photo ID matching the relevant information within the customer's account records.

7. Charter employs a variety of internal and external operating procedures designed to ensure compliance with the FCC's CPNI rules. Such procedures include:

A) The publication of a subscriber privacy policy and appended CPNI policy on Charter's website, circulation of those policies within Charter, and the provision of those policies to new subscribers as part of Charter's welcome package and as part of Charter's annual privacy policy notification.

B) Regular recurring training programs for employees, agents and contractors governing the use and disclosure of personally identifiable information, including CPNI.

C) The administration of an employee disciplinary program designed to ensure compliance with internal procedures. Such program includes a variety of different penalties for the violation of internal privacy procedures, including the termination of employment where appropriate.

D) The use of a system that establishes each subscriber's individual privacy preferences at the initiation of service and allows for changes to those preferences as validly requested by the subscriber.

² It is Charter's practice to authenticate a customer prior to discussing any call detail information, even if the customer provides call detail information to the CSR first.

E) Physical and software based security systems limiting employee access to subscriber information in paper or electronic form, including CPNI.

F) The maintenance of records of those occasions when CPNI is released to third parties pursuant to written contractual agreement.

8. As required by 47 C.F.R. § 64.201(f), Charter also maintains a system that notifies customers whenever a password, customer response to back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed (except when the customer initiates service).

9. Charter did not take any action (*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 2018. Moreover, Charter has no information to report with respect to the processes pretexters are using to attempt to access CPNI, and what steps other carriers are taking to protect CPNI.

10. For the period beginning January 1, 2018 and continuing through and including December 31, 2018, Charter received sixty-seven (67) customer inquiries involving the alleged unauthorized release of CPNI. After investigation of these complaints, Charter has reported the unauthorized disclosure of CPNI to the FCC and law enforcement authorities via the FCC's breach-reporting portal, as summarized below:

CPNI CUSTOMER INQUIRIES	2018
Alleged Unauthorized Access by Employees	
• Total Customer Inquiries Received	0
• Total Validated	0
Alleged Improper Disclosure to Unauthorized Parties	
• Total Customer Inquiries Received	46
• Total Validated	2
Alleged Improper Access to On-Line Information by Unauthorized Parties	
• Total Customer Inquiries Received	21
• Total Validated	3
Actions Taken Against Pretexters	
• Court Actions	0
• State Commission Actions	0
• FCC Actions	0