

Annual 47 C.F.R. § 64.2009(e) CPNI Certification, EB Docket 06-36

1. Date filed: *March 1, 2019*
2. Name of company(s) covered by this certification: *Google Fiber North America Inc.*
3. Form 499 Filer ID: *831529*
4. Name of signatory: *Fleur Knowsley*
5. Title of signatory: *Secretary*
6. Certification:

I, Fleur Knowsley, 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 C.F.R. § 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 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) against data brokers in the past year.

The company has not received 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 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.

Signed *Fleur Knowsley* [Signature of an officer, as agent of the carrier]

GOOGLE FIBER NORTH AMERICA INC. STATEMENT OF COMPLIANCE REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")

Google Fiber North America Inc. ("GF" or "Company") provides this statement pursuant to 47 C.F.R. § 64.2009(e) to explain how GF's operating procedures were designed to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission") for calendar year 2018.

Safeguarding CPNI

GF has implemented strong measures to discover and protect against attempts to gain unauthorized access to CPNI. In addition to its internal policies, which are designed to ensure compliance with the Commission's CPNI Rules, GF publishes an online Privacy Notice for its customers, which explains how GF uses, discloses, and protects customer information, including CPNI, consistent with applicable law. GF is committed to constant assessment and improvement in its security and operating procedures with respect to CPNI.

Notice of CPNI Rights and Customer Approval

During the reporting period, GF did not to use, disclose, or permit access to its customers' CPNI without customer approval except as permitted under 47 C.F.R. § 64.2005, or as otherwise provided in Section 222 of the Communications Act. Accordingly, the customer notice and associated record-keeping requirements of the Commission's CPNI rules (47 CFR §§ 64.2007 and 64.2008) are not applicable. Nonetheless, GF informed its users through its Privacy Notice that its policies permit disclosure of CPNI only as required or permitted by law, unless the customer opts in to use of CPNI for the purpose of marketing the services of GF's communications-related affiliates. GF maintains records of such opt-in approvals for at least one year. Should GF change its policies such that additional customer notice is required, such notice will be provided.

Marketing Campaigns

GF has dedicated in-house legal counsel responsible for the review of marketing campaigns.

Customer Authentication

GF has established procedures requiring proper customer authentication prior to disclosing CPNI. For example, GF's customer support representatives are not authorized to discuss CPNI during customer-initiated telephone contacts unless the customer is first able to provide authentication such as a one-time, randomly-generated password assigned to the customer by GF.

Employee & Representative Training Program

GF provides Company-wide recurring training to educate its employees and representatives regarding the confidentiality of customer information. GF augments this Company-wide training with targeted training for customer service representatives. Such training provides front-line employees and representatives with additional information concerning safeguarding CPNI and other customer information along with specific training regarding proper authentication of inbound customer inquiries by telephone or online. GF also provides additional training to other functional groups, such as the marketing and legal departments.

Employee Discipline Program

Through its parent company, Google LLC, GF has a disciplinary process in place to address noncompliance with Company policies, including policies concerning employee use of, access to, and disclosure of CPNI. An employee found to have violated GF's policies, including policies relating to use of, access to, and disclosure of CPNI, is subject to disciplinary action up to and including termination.

Notice of Security Breaches

GF's policy is to notify law enforcement as soon as practicable, but in no event later than seven (7) business days, after a reasonable determination has been made that a breach of its customer's CPNI has occurred. The notice process conforms to procedures established by the Commission and is otherwise in accordance with 47 C.F.R. § 64.2011.

GF's policy is to notify customers of the breach no sooner than the eighth business day following completion of the notice to law enforcement unless directed by the U.S. Secret Service or the FBI not to so disclose or notify customers. GF respects any agency request that GF not to disclose the breach for an initial period of up to 30 days, which may be extended further by the agency. The requesting agency must provide its direction in writing, as well as any notice that delay is no longer required.

Notice of Opt-Out Failures

GF's policy is not to use, disclose, or permit access to CPNI without the customer's opt-in approval, or unless permitted or required under the Commission's rules without customer approval. That is, we do not use, disclose, or permit access to CPNI on an opt-out basis. Should this policy change, GF will provide written notice of any opt out failures to the Commission within five business days as specified in the Commission's rules.

Recordkeeping of Unauthorized Disclosures of CPNI, Customer Complaints, and Actions Taken Against Data Brokers

GF's policy is to maintain a record of CPNI security breaches, notifications made to law enforcement, and notifications made to customers for at least two years.

GF's policy is that customer complaints concerning the unauthorized release of CPNI are reported and investigated internally, and are broken out by category of complaint (e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized). A summary of any such complaints during the certification period is included as Attachment A.

A record of actions taken by GF against data brokers, if any, is maintained and an explanation of such actions is included as Attachment B. GF did not detect pretexting activities by data brokers during the reporting period. GF deploys safeguards to protect against, detect, and mitigate pretexting activities.

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ATTACHMENT A

SUMMARY OF GOOGLE FIBER NORTH AMERICA INC.'S CUSTOMER COMPLAINTS CONCERNING THE ALLEGED UNAUTHORIZED ACCESS OR RELEASE OF CPNI

GF has implemented comprehensive policies and procedures to capture and investigate any customer complaints made to any Company business channel (e.g., customer care, Internet, etc.) concerning alleged unauthorized access or release of user information. During the reporting period, GF did not receive any complaints concerning alleged unauthorized access or release of CPNI.

Complaint Type	Quantity
Alleged Unauthorized Access by Employees	0
Alleged Improper Disclosure to Unauthorized Persons	0
Alleged Unauthorized Access to Online Information	0
TOTAL	0

ATTACHMENT B

**GOOGLE FIBER NORTH AMERICA INC. PROCEEDINGS INSTITUTED OR
PETITIONS FILED AGAINST DATA BROKERS**

Type of Action	Quantity
Court	0
State Commission	0
Federal Communications Commission	0
TOTAL	0