Office of the Secretary

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2018 Annual Statement of FCC CPNI Rule Compliance

RE: EB Docket No. 06-36

March 1, 2019

This statement serves to explain how Bitcom, LLC is complying with FCC rules related to CPNI and the privacy of customer information per Part 64, Subpart U, Sections 64.2001 through 64.2011.

1. Bitcom, LLC has established procedures and trained employees having access to CPNI in the following areas:
2. What CPNI is and how it may be used under Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934.
3. The different types of telecommunications and non-telecommunications affected by CPNI Rules.
4. How and when the use of CPNI requires customer authorization under Section 64.2005 and to identify uses of CPNI not requiring customer authorization. Bitcom, LLC understands that it may obtain customer approval through written, oral or electronic methods to share information for the purpose of establishing service, and that individual notice to customers is provided when soliciting approval for use of customer’s CPNI.
5. Bitcom, LLC does not share CPNI among its affiliates.
6. Bitcom, LLC’s customers on-line access is non-functional at this time, therefore there is no password authentication established.
7. During Calendar Year 2018 there have been no actions taken against Data Brokers.
8. During Calendar Year 2018 there have been no customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure, or online access, to individuals not authorized.
9. Bitcom, LLC, per Section 64.2009, has a disciplinary process to follow should any unauthorized use of CPNI occur where authorization is required.
10. Bitcom, LLC has procedures for notifying law enforcement of CPNI security breaches, with record keeping and notification to customers per Section 64.2001.