

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: March 1, 2018
2. Name of company(s) covered by this certification: France Telecom Corporate Solutions, L.L.C. ("FTCS" or the "Company")
3. Form 499 Filer ID: 822706
4. Name of signatory: Neomi Groman
5. Title of signatory: Treasurer
6. Certification:

I, Neomi Groman, certify that I am the Treasurer 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 _____


Neomi Groman
Treasurer
France Telecom Corporate Solutions, L.L.C.

Attachment: Accompanying Statement concerning CPNI procedures

Attachment 1: Statement Concerning Company Procedures

Background

FTCS commenced providing Interconnected VoIP services, defined under Section 9.3 of the FCC's rules, 47 C.F.R. Sec. 9.3, in 2015.

FTCS provides Interconnected VoIP services mainly to large business (enterprise) customers.

The following Customer Proprietary Network Information ("CPNI") procedures apply to FTCS' Interconnected VoIP services subject to 47 C.F.R. Sec. 64.2009. CPNI is defined by 47 U.S.C. Sec. 222(h)(1).

General duty, training, and discipline.

FTCS has adopted and distributed to all employees a confidentiality policy that addresses proper handling and use of CPNI and advises all employees of their duty to safeguard CPNI. Employees are advised that violations of the confidentiality policy will subject an employee to disciplinary action, up to and including immediate termination of employment. The Company makes CPNI available to employees only on a need-to-know basis.

Use of customer proprietary network information without customer approval (47 C.F.R. § 64.2005); Approval required for use of customer proprietary network information (47 C.F.R. § 64.2007); Notice required for use of customer proprietary network information (47 C.F.R. § 64.2008); Safeguards required for use of customer proprietary network information (47 C.F.R. § 64.2009)

The Company does not use, disclose, or permit access to CPNI for marketing purposes. The Company does not disclose CPNI to third parties or permit third parties to access or use CPNI except as permitted by law.

Safeguards on the disclosure of customer proprietary network information (47 C.F.R. § 64.2010)

The Company does not provide any telephone or in-store access to CPNI. Customers requesting CPNI by telephone will be provided with CPNI only by sending it to the customer's address of record or by calling the customer at the telephone address of record.

Customers may access their CPNI online only after they have been authenticated without using readily available biographical information or account information. After initial authentication, customers may only access CPNI online by providing a password that is not prompted by a request for readily available biographical information or account information. Customers that have lost or forgotten their passwords may retrieve their passwords by proving an answer to a shared secret question. If a customer cannot



provide the correct password or the correct response to the shared secret question, the customer must be reauthenticated and must establish a new password.

The Company notifies its customers immediately by email to the customer's email address of record of any changes to customer password, answer to shared secret questions, online account information, or address of record. This notice does not reveal the changed information and is sent to the existing address, not to an address or telephone number that has been changed.

Notification of customer proprietary information security breaches (47 C.F.R. § 64.2011)

The Company's operating procedures require notification of relevant law enforcement agencies and customers in accordance with FCC rules in the event of a breach of CPNI. The Company maintains records of any breaches discovered, notifications made to law enforcement, and notifications made to customers. These records include, where available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. The Company retains these records for 2 years.

