

March 1, 2018

Via ECFS

Ms. Marlene H. Dortch
Office of the Secretary, FCC
455 12th St. SW
Washington, DC 20554

Re: 2017 CPNI Compliance Certification

Dear Ms. Dortch:

Attached for filing is CaptionCall, LLC's 2017 CPNI Compliance Certification and Statement as required by 47 C.F.R. § 64.2009(e).

Respectfully submitted,



Adrienne E. Fowler
Counsel to CaptionCall, LLC

2017 Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Re: Annual 64.2009(e) CPNI Certification for 2017
Name of company: CaptionCall, LLC
Form 499 Filer ID: 830295
Name of signatory: Bruce Peterson
Title of signatory: Vice President of Marketing

I, Bruce Peterson, certify that I am an officer of CaptionCall, LLC ("CaptionCall") and I have personal knowledge that, throughout 2017, the company had an established Customer Proprietary Network Information ("CPNI") policy that was adequate to ensure compliance with the Commission's CPNI rules contained in 47 C.F.R. Part 64, Subpart U.

Attached to this certification is an accompanying statement explaining how CaptionCall's policy ensures compliance with the requirements of 47 C.F.R. Part 64, Subpart U. CaptionCall represents and warrants that this statement is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. CaptionCall 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: 
Bruce Peterson

Executed February 28, 2018.

CaptionCall, LLC
2017 CPNI Compliance Statement of Operating Procedures

CaptionCall, LLC (the “Company” or “CaptionCall”) submits this compliance statement as required by 47 C.F.R. § 64.2009(e). During the 2017 reporting period, CaptionCall had in place a Customer Proprietary Network Information Policy (“CPNI Policy”) that is sufficient to ensure compliance with the Commission’s CPNI regulations.

General duty, training, and discipline

The CPNI Policy defines CPNI consistently with 47 C.F.R. § 64.2003, addresses proper handling and use of CPNI, imposes a duty on employees to safeguard CPNI, and provides that violations of the CPNI 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. During the reporting period, CaptionCall provided a training on its CPNI Policy for employees who have access to CPNI.

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 except as permitted by Section 222 of the Communications Act or regulations implementing Section 222 of the Communications Act. The Company does not disclose CPNI to third parties or permit third parties to access or use CPNI, except as permitted by Section 222 of the Communications Act or regulations implementing Section 222 of the Communications Act.

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

CaptionCall protects against attempts to gain unauthorized access to CPNI and authenticates a customer prior to disclosing CPNI. It does not operate retail locations; accordingly, its customers have no in-store access to CPNI.

For access to CPNI over the telephone, via telephone relay service, or via a point-to-point video call, CaptionCall authenticates a customer through use of a password that is not prompted by the carrier asking for readily available biographical information or account information, or as otherwise provided in 47 C.F.R. § 64.2010(b). If the customer does not recall his or her password, CaptionCall authenticates the customer without using readily available biographical information or account information.

Customers may also access their CPNI online and establish a password for future access only after being authenticated without using readily available biographical information or account information. After initial authentication, customers may access CPNI online only by providing their pre-established password, which is not prompted by CaptionCall asking for readily available biographical information or account information. Customers that have lost or

forgotten their passwords may retrieve their passwords by their previously provided answer to a secret question, which does not involve the use of readily available biographical information or account information. If a customer cannot provide the correct password or the correct response to the shared secret question, the customer must be re-authenticated and must establish a new password.

The CPNI Policy requires immediate customer notification whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed. This notice does not reveal the changed information and is sent to the existing telephone number of record, by mail to the existing physical address of record, or by e-mail to the existing e-mail address of record, and not to any address or number that has been changed.

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

CaptionCall is unaware of any breach of CPNI during the reporting period. The CPNI Policy requires notification of relevant law enforcement agencies and customers in accordance with FCC rules in the event of a breach of CPNI. CaptionCall will maintain records of any breaches discovered, notifications made to law enforcement, and notifications made to customers. These records will 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 will maintain these records for 2 years.

Any actions against data brokers or customer complaints (47 C.F.R. § 64.2009(e))

CaptionCall has not taken any actions against data brokers in the preceding year, nor had any customer complaints concerning the unauthorized release of CPNI.

Instances where opt-out mechanisms do not work properly (47 C.F.R. § 64.2009(f))

CaptionCall has not faced any instance where the opt-out mechanisms did not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.