

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

Date filed: March 1, 2018

Name of companies
covered by this
certification: Comcast Legal Entities Listed in Attachment A

Form 499 Filer ID: See Attachment A

Name of signatory: Julie Laine

Title of signatory: Vice President and Senior Deputy General Counsel, Comcast Corporation
and Senior Vice President, Chief Compliance Officer, Comcast Cable

I, Julie Laine, certify that I am an officer of Comcast Cable Communications, LLC, parent company of the Comcast legal entities listed in Attachment A (which are collectively referred to herein as “the Company” or “Comcast”), and, acting as an agent of the Company, that I have personal knowledge that Comcast has established policies and operating procedures that are adequate to ensure compliance with the Federal Communications Commission’s (“Commission”) 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 it 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 did not take any actions against data brokers in 2017.

The Company did receive customer complaints in 2017 concerning the alleged unauthorized release of CPNI. Included at the end of this certification is a chart summarizing these complaints, broken down by category.

The Company represents and warrants that the above certification is consistent with section 1.17 of the Commission’s rules, 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: Julie Laine

Julie Laine

Senior Vice President, Chief Compliance Officer, Comcast Cable

Comcast CPNI Compliance Statement

Comcast has developed and implemented procedures designed to ensure compliance with the Commission's rules codified at 47 C.F.R. § 64.2001, *et seq.* and Commission orders governing the use and disclosure of CPNI. Compliance with such rules is demonstrated by the policies, practices, training, and audit procedures currently employed by Comcast and briefly described below.

First, as to the use of CPNI for marketing purposes, it is Comcast's current policy not to use, disclose, or permit access to CPNI for the purpose of marketing service offerings that are within a category of service to which the subscriber does not already subscribe.

Second, it is Comcast's policy to release CPNI to third-party vendors only pursuant to a written agreement containing the appropriate restrictions regarding the confidentiality and safeguarding of CPNI, and only for the limited purposes of initiating, rendering, maintaining, and/or billing or collecting for services rendered to Comcast's subscribers.

Third, Comcast's customer support representatives are not authorized to discuss call detail information over the phone during customer-initiated calls until a representative is first able to authenticate the customer with a password or back-up authentication method. Alternatively, call detail information may be disclosed over the phone only if the customer is first able to identify and provide specific information about the call(s) without the representative's assistance, or if the representative calls the customer at the telephone number of record. Additionally, customer support representatives are not authorized to discuss non-call detail CPNI over the phone during a customer-initiated call until the representative is first able to properly authenticate the customer.

Fourth, it is Comcast's policy not to provide online access to CPNI until Comcast authenticates the customer requesting such access with a password consistent with the requirements in section 64.2010(e), and the customer is authenticated without the use of readily available biographical information or account information.

Fifth, it is Comcast's policy not to disclose CPNI to a customer at a retail location unless the customer presents a valid government-issued photo ID matching the customer's account information.

Sixth, Comcast utilizes an automated system that monitors and records account changes made to all voice customer accounts, and generates a notification to the customer regarding such changes.

Seventh, it is Comcast's policy to notify law enforcement of a breach of its customers' CPNI as soon as practicable, and in no event later than seven (7) business days, after reasonable determination of the breach, by electronic notification to the United States Secret Service and the Federal Bureau of Investigation through the central reporting facility. Comcast also notifies affected customers, but will not do so or otherwise disclose the breach to the public until seven (7) full business days have passed after notification to law enforcement, except in such cases as

Comcast has reason to believe that there is an extraordinarily urgent need and only then after consultation with and in cooperation with the relevant law enforcement agency. Comcast will delay notification to customers or any other public disclosure if directed to do so in writing by the relevant law enforcement agency. Comcast maintains a record for at least two (2) years of any breaches discovered and notifications made regarding such breaches.

Eighth, Comcast employs a variety of other internal and external operating procedures designed to ensure compliance with the remaining CPNI regulations. Such procedures include:

- A. The publication of privacy policies, which include CPNI-specific information, at:
 - <https://www.xfinity.com/Corporate/Customers/Policies/CustomerPrivacy>
 - <https://business.comcast.com/privacy-statement>
 - <https://www.xfinity.com/mobile/policies/privacy-policy>
- B. Recurring training programs for Comcast employees concerning privacy, which address governing rules and regulations, company policies, processes and procedures, and the proper use of CPNI.
- C. The implementation and administration of an employee disciplinary program designed to ensure compliance with internal procedures. Such program includes a variety of potential disciplinary actions for the violation of internal privacy procedures, including the termination of employment where appropriate.
- D. Physical and software-based security systems limiting employee access to subscriber information in paper or electronic form, including CPNI.
- E. The maintenance of records of those occasions when CPNI is validly released to third parties.

2017 CPNI Complaint Summary of Comcast

CPNI Complaints	2017
Unauthorized Access by Comcast Employees/Agents	0
Improper Disclosure of CPNI to Unauthorized Parties	1
Improper Access to Online Information by Unauthorized Parties	35

ATTACHMENT A

FORM 499 FILER ID	LEGAL NAME
825948	Comcast IP Phone, LLC
832043	Comcast OTR1, LLC
812736	Comcast Business Communications, LLC
822102	Comcast Phone, LLC
824688	Comcast Phone II, LLC
824416	Comcast Phone of New York, LLC
820956	Comcast Phone of Michigan, LLC