

CaptionCall, LLC
2018 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 2018 reporting period, CaptionCall had in place a Customer Proprietary Network Information Policy (“CPNI Policy”) that was sufficient to ensure compliance with the Commission’s CPNI regulations, subject to a rare circumstance described below, which has been corrected.

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 or via telephone relay service, 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), with the limited exception of the form of customer authentication CaptionCall used on rare occasions prior to the release of network configuration-related information. This issue has since been rectified. This issue did not result in any known release of CPNI to an unauthorized person.

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.