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**Via ECFS**

March 9, 2018

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

*RE: EB Docket No. 06-36: Annual 47 C.F.R. § 64.2009(e) CPNI Certification*

Dear Ms. Dortch:

Enclosed for filing with the Federal Communications Commission ("FCC"), please find the annual CPNI compliance certificate for TELUS Communications (U.S.) Inc. and TELUS International (U.S.) Corp. (collectively "TELUS").

The following TELUS affiliates also hold federal registration numbers from the FCC, but did not provide any telecommunications services during the 2017 calendar year, and, therefore, are not required to submit a compliance certificate: TELUS Corporation, TELUS Communications Inc., and TELUS Communications Company. To the extent that these entities in the future may provide telecommunications, the TELUS CPNI policies stated herein will apply to all such entities.

If you have any questions regarding the attached CPNI Compliance certificate, please contact me using the contact information listed above.

Thank you for your assistance with this matter.

Respectfully submitted,

A handwritten signature in black ink that reads 'Erin Emmott'.

Erin W. Emmott  
President  
TELUS Communications (U.S.) Inc.

Attachments

**TELUS COMMUNICATIONS (U.S.) INC.  
TELUS INTERNATIONAL (U.S.) CORP.  
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 9, 2018
2. **Names of company(s) covered by this certification:** TELUS Communications (U.S.) Inc. and TELUS International (U.S.) Corp. (collectively, "TELUS")<sup>1</sup>
3. **Form 499 Filer ID:** 829571
4. **Name of Signatory:** Erin Emmott
5. **Title of Signatory:** President
6. **Certification:**

I, Erin Emmott, certify that I am an officer of TELUS and acting as an agent of TELUS, I have personal knowledge that TELUS 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 TELUS' procedures ensure that TELUS is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

TELUS 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.

TELUS has not received customer complaints in the past year concerning the unauthorized release of CPNI.

TELUS 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. TELUS 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 \_\_\_\_\_



Erin W. Emmott  
President  
TELUS Communications (U.S.) Inc.

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<sup>1</sup> As stated in the cover letter, although five TELUS entities hold FRNs from the Commission, only two TELUS entities – TELUS Communication (U.S.) Inc. and TELUS International (U.S.) Corp. – provided any telecommunications services during the 2017 calendar year. Accordingly, the remaining entities are not required to submit CPNI certifications. To the extent that such entities in the future provide telecommunications services, they will be bound by the TELUS CPNI policy stated herein.

**TELUS COMMUNICATIONS (U.S.) INC.  
TELUS INTERNATIONAL (U.S.) CORP.  
STATEMENT OF CPNI OPERATING PROCEDURES**

TELUS Communications (U.S.) Inc. and TELUS International (U.S.) Corp. (collectively "TELUS") have established policies and procedures to comply with the FCC's rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in title 47, section 64.2001 *et seq.* of the Code of Federal Regulations. These procedures ensure that each company is compliant with the FCC's CPNI rules. This statement is a summary of TELUS' policies and procedures designed to safeguard CPNI.

1. TELUS may use, disclose and/or permit access to CPNI relating to U.S. customers and/or the telecommunications services that TELUS provides to customers with locations in the United States for the following purposes:
  - (A) for the provision of the telecommunications services from which such information is derived, or
  - (B) for the provision of services necessary to, or used in, the provision of such telecommunication service, including the publishing or directories; or,
  - (C) for the following limited purposes:
    - (1) to initiate, render, bill, and collect for telecommunications services;
    - (2) to protect the rights or property of TELUS, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
    - (3) to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if such call was initiated by the customer and the customer approves the user of such information to provide such services; and,
    - (4) to the extent applicable, to provide call location information concerning the user of a wireless services:
      - (i) to a public safety answering point ("PSAP"), emergency medical service provider, or emergency dispatch provider, public safety, fire service, or law enforcement official, or hospital emergency or trauma care facility, in order to respond to the user's call for emergency services;
      - (ii) to inform the user's legal guardian or member of the user's immediate family of the user's location in an emergency situation that involves the risk of death or serious physical harm; or
      - (iii) to providers of information or database management services solely for purposes of assisting in the delivery of emergency services in response to an emergency.
2. TELUS does not use CPNI relating to its U.S. customers and/or the telecommunications services that TELUS provides to its customers located in the United States to conduct outbound marketing or in connection with its sales and marketing campaigns. TELUS also does not disclose or permit access to CPNI relating to its U.S. customers and/or telecommunications services that TELUS provides to its customers located in the United States to affiliates or third parties for marketing purposes. TELUS has expressly identified the use, disclosure, or access to CPNI relating to its U.S. customers and/or the telecommunication services that TELUS provides to its customers located in the United States for marketing purposes as a non-legitimate business purpose.

3. TELUS has implemented privacy and other ethical policies and procedures that restrict and prohibit its personnel from accessing and/or making use of customer data or information, including CPNI, for purposes other than legitimate business purposes.
4. TELUS trains its personnel in relation to these privacy policies and procedures, and, in particular, when personnel are and are not permitted to use CPNI. TELUS has established disciplinary procedures, including and up to termination, for violations of these policies and procedures.
5. TELUS has implemented procedures to authenticate its customers.
6. TELUS has instituted measures to discover and protect against unauthorized attempts to access CPNI. Among other measures, TELUS has adopted implemented internal security procedures and other network security protocols, including, without limitation, encrypting data.
7. TELUS has implemented policies pursuant to which it will track any breaches of CPNI, and will notify the United States Secret Service and the Federal Bureau of Investigation, and its customer (if permitted) upon reasonable discovery of a breach of CPNI. TELUS will maintain a record of such information for a two-year period.
8. TELUS will track customer complaints regarding CPNI.
9. TELUS will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that TELUS has established to safeguard CPNI.