



Sprint Corporation
Mailstop DCWASP0701
900 7th Street, NW
Suite 700
Washington DC 20001
Office: (703) 592-7580
Fax: (202) 585-1940

Maureen Cooney
Head of Privacy
Office of Privacy
maureen.cooney@sprint.com

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Date filed: March 1st, 2019

Eliot J. Greenwald
Deputy Chief
Disability Rights Office - Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **2018 Annual TRS CPNI Compliance Certification, CG Docket No. 03-123**

Dear Mr. Greenwald:

Attached, for filing in CG Docket No. 03-123, is the annual 47 C.F.R. § 64.5109(e) TRS CPNI Compliance Certification and accompanying statement of Sprint Corporation.

If there are any questions regarding this filing, please contact the undersigned. Thank you for your assistance.

Respectfully submitted,

Maureen Cooney by: *Christyl Manton*

Maureen Cooney
Head of Privacy – Office of Privacy
Sprint Corporation

SPRINT CORPORATION
ATTACHMENT A
2018 Annual 47 C.F.R. § 64.5109(e) TRS CPNI Compliance Statement

The following statement explains the operating procedures established by Sprint Corporation ("Sprint" or "Company") to ensure that it is in compliance with the Federal Communications Commission's ("FCC" or "Commission") TRS Customer Proprietary Network Information ("TRS CPNI") rules (see 47 C.F.R. § 64.5101 *et seq.*).¹

Data Brokers

Sprint did not detect any pretexting activities by data brokers in 2018. Therefore, Sprint did not institute any proceedings or file any petitions against any data broker in any state commission, the court system or the FCC. Sprint continues to deploy safeguards to protect against, detect, and mitigate pretexting activities.

CPNI Complaints

Sprint did not receive any complaints in 2018 concerning the unauthorized release of TRS CPNI.

Use, Disclosure and Access to CPNI

Sprint did not use, disclose or permit access to TRS CPNI in 2018 without complying with the procedures specified in 47 C.F.R. § 64.5101 *et seq.* More specifically, Sprint does not use, disclose, or permit access to TRS CPNI for marketing purposes or for any other reason not authorized in 47 U.S.C. §64.5105(c). As such Sprint does not send notices, or obtain approvals, for the use of TRS CPNI.

Safeguards

Sprint takes reasonable measures to discover and protect against attempts to gain unauthorized access to TRS CPNI.

Consistent with Sprint's commitment to preserving customer privacy, the Company has a variety of training programs for its employees and contractors. The training explains how Sprint employees and contractors must access, use, store, disclose and secure CPNI to ensure compliance with the FCC's rules and Company policies. In 2018, all employees and all contractors who had access to CPNI were required to take CPNI training.

Sprint also maintains a disciplinary process as part of Company procedures that addresses CPNI compliance. Sprint security personnel investigate instances of potential improper access or disclosure of CPNI by employees. If the investigation indicates a violation has occurred, disciplinary action is taken, up to and including termination.

Before disclosing CPNI to independent contractors or joint venture partners, Sprint enters into agreements with appropriate privacy and confidentiality provisions that require third parties to maintain confidentiality, protect the information, and comply with the law. Sprint's Office of Privacy continually reviews Sprint's standard privacy-related contract terms and conditions to ensure that those provisions are designed to adequately safeguard customer information. In negotiating and renewing its contracts, Sprint requires independent contractors and joint venture partners with which it shares CPNI to safeguard this information in a manner that is consistent with the FCC's rules and retains the right to terminate the contract in the event of a breach.

Authentication

Sprint does not currently offer telephonic, online or in-store access to TRS CPNI. Therefore, the authentication requirements in 47 C.F.R. §64.5110 are not applicable at this time.

Notification of Account Changes

Sprint provides notice to its customers when a triggering event occurs. Such events include the creation of, or change to, a password, email address or address of record. These notifications are made to the customer's email address of record. The notification includes information to alert the customer of the underlying event, but does not disclose any of the new or changed information, in accordance with the FCC's rules.

¹ This certification covers Sprint's traditional TRS and iTRS services.

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Notification of CPNI Breaches

In accordance with the Commission's rules, Sprint provides notice to law enforcement in the event that a breach of customer information includes CPNI. Sprint also provides notice to impacted customers after completing the process of notifying law enforcement. Such notification provides customers with enough information to understand the nature of the breach, the scope of impacted information and recommendations on how the customer should respond. If the impacted customer alerts Sprint of a potential breach, Sprint investigates the customer's allegations and communicates as necessary with the customer and/or law enforcement.



Sprint Corporation
6360 Sprint Parkway
Overland Park, KS 66251
Office: (913) 762-7000
Fax: (913) 523-0302

Michael Fitz
Vice President – Sprint Wireline
michael.fitz@sprint.com

**2018 Annual 47 C.F.R. §64.5109(e) TRS CPNI Certification
CG Docket 03-123**

Date Filed: March 1, 2019

Name of company covered by this certification: Sprint Corporation

Name of Signatory: Michael Fitz

Title of Signatory: Vice President – Sprint Wireline

**SPRINT CORPORATION
2018 CPNI COMPLIANCE CERTIFICATE AND STATEMENT**

I, Michael Fitz, certify that I am an officer of Sprint Corporation and I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's TRS CPNI rules (see 47 C.F.R. § 64.5101 *et seq.*).

Attached to this certification is an accompanying statement explaining how the company's operating procedures ensure that the company is in compliance with the requirements set forth in sections 64.5101 through 64.5111 of the Commission's rules. The statement also addresses any (1) actions taken against data brokers, (2) customer complaints received in the past year concerning the unauthorized release of TRS CPNI, and (3) instances where the TRS provider, or its agents, contractors, or subcontractors, used, disclosed, or permitted access to TRS CPNI without complying with the specified procedures.

The company represents and warrants that the 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.

Executed on February 27th, 2019

A handwritten signature in black ink, appearing to read "Michael Fitz", written over a horizontal line.

Michael Fitz
Vice President – Sprint Wireline
Sprint Corporation

Attachment: Accompanying statement